

No. 16-1466

Janus v. Am. Fed'n of State, Cty., and Mun. Emps., Council 31 et al.,

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Amicus Curiae Brief of Pacific Legal Foundation contains 7,150 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 28, 2017.



DEBORAH J. LAFETRA
Pacific Legal Foundation
930 G Street
Sacramento, California 95814
Telephone: (916) 419-7111
E-mail: DLaFetra@pacificlegal.org
*Counsel for Amici Curiae
Pacific Legal Foundation*