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No. 16-1466

MARK JANUS,

Petitioner,

v.

AMERICAN FEDERATION OF STATE, COUNTY, AND MUNICIPAL EMPLOYEES, COUNCIL 31, et al.,

Respondents.

AFFIDAVIT OF SERVICE

I HEREBY CERTIFY that on December 5, 2017, three (3) copies of the BRIEF OF THE RUTHERFORD INSTITUTE AS *AMICUS CURIAE* IN SUPPORT OF PETITIONER in the above-captioned case were served, as required by U.S. Supreme Court Rule 29.5(c), on the following:

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Sworn to and subscribed before me this 5th day of December 2017.

CHRISTOPHER R. DORSEY

NOTARY PUBLIC

District of Columbia

My commission expires July 31, 2018.