In The Supreme Court of the United States

MARK JANUS,

Petitioner,

 \mathbf{v} .

AMERICAN FEDERATION OF STATE, COUNTY, AND MUNICIPAL EMPLOYEES, COUNCIL 31, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Walter M. Weber, a member of the Bar of this Court and an attorney for amicus, pursuant to Rule 33.1(h), hereby certifies that the Amicus Brief of the American Center for Law and Justice in Support of Petitioner complies with the pertinent word limitations. The body of the document, including footnotes (but exclusive of all material preceding the Interest of Amicus and all material following the last word of the text of the conclusion), contains 3,856 words.

Walter M. Weber

December 6, 2017