

No. 16-1466

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IN THE  
**Supreme Court of the United States**

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MARK JANUS,

*Petitioner,*

v.

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

*Respondents.*

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for California Public-School Teachers as *Amici Curiae* in Support of Petitioner in *Janus v. American Federation of State, County, and Municipal Employees, Council 31*, No. 16-1466, complies with the word limitations, as it contains 8,183 words.

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

Date: December 6, 2017

  
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Adria R. Villar