



## CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 unbound copy and 40 copies of the foregoing Brief of *Amicus Curiae* the 1851 Center for Constitutional Law in Support of Petitioner in 16-1466, *Mark Janus v. American Federation of State, County and Municipal Employees, Council 31, et al.*, were sent via Two Day Service to the U.S. Supreme Court, and 3 copies were sent via Two Day Service and e-mail to the following parties listed below, this 6th day of December, 2017:

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All parties required to be served have been served.

I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on December 6, 2017.

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Subscribed and sworn to before me by the said Affiant on the date below designated.

Date: December 6, 2017

J. A. Kershner  
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[seal]



JIMIE ANNE KERSHNER  
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My Commission Expires  
February 21, 2018