SUPREME COURT OF THE UNITED STATES Case No. 16-1466

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MARK JANUS,

Petitioners,

v.

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

Respondents.

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CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,336 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 December 6, 2017

Candice Best

Sworn to and subscribed before me this 6th day of December, 2017 Elias Melendez #277498 Eller Commission Expires Aug. 31, 20,