

No. 16-1466

---

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

---

MARK JANUS,

*Petitioner,*

*v.*

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

*Respondents.*

---

ON WRIT OF CERTIORARI TO THE  
UNITED STATES COURT OF APPEALS  
FOR THE SEVENTH CIRCUIT

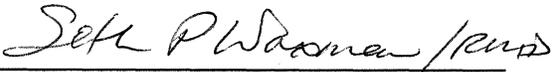
---

**CERTIFICATE OF COMPLIANCE**

---

As required by Supreme Court Rule 33.1(h), I, Seth P. Waxman, a member of the bar of this Court, certify that the accompanying Brief for Amici Curiae Charles Fried and Robert C. Post in Support of Neither Party contains 8,054 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on December 6, 2017.



---

SETH P. WAXMAN  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
1875 Pennsylvania Avenue, NW  
Washington, DC 20006  
(202) 663-6000  
seth.waxman@wilmerhale.com