

E-Mail Address: briefs@wilsonepes.com

Tel (202) 789-0096 Fax (202) 842-4896

775 H Street, N.E.

Washington, D.C. 20002

Web Site: www.wilsonepes.com No. 16-1466

MARK JANUS,

Petitioner,

V.

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

Respondents.

AFFIDAVIT OF SERVICE

I HEREBY CERTIFY that on December 6, 2017, three (3) copies of the BRIEF OF THE JAMES MADISON INSTITUTE AS AMICUS CURIAE IN SUPPORT OF PETITIONER in the above-captioned case were served, as required by U.S. Supreme Court Rule 29.5(c), on the following:

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DAVID LEIGH FRANKLIN, ESQ.
OFFICE OF THE ATTORNEY GENERAL
OF ILLINOIS
100 W Randolph St
Chicago, IL 60604

DAVID C. FREDERICK, ESQ.
KELLOGG, HANSEN, TODD FIGEL &
FREDERICK, P.L.L.C
1615 M St NW, Ste 400
Washington, DC 20036

The following email addresses have also been served electronically:

meritsbriefs@supremecourt.gov jhawkes@foley.com wlm@nrtw.org dranklin@atg.state.il.us dfrederick@kellogghansen.com

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775 H Street, N.E.

Washington, D.C. 20002

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CHRISTOPHER R. DORSEY

NOTARY PUBLIC District of Columbia

My commission expires July 31, 2018.