

**CERTIFICATE OF COMPLIANCE**

No. 16-1466

MARK JANUS,  
PETITIONER,

*v.*

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

As required by Supreme Court Rule 33.1(g), I certify that the brief of respondents Lisa Madigan and Michael Hoffman contains 14,955 words, excluding parts of the petition 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 January 12, 2018.

  
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