

CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 unbound copy and 40 copies of the foregoing Brief of Steve Bullock, Governor of Montana, as *Amicus Curiae* in Support of Respondents in 16-1466, *Mark Janus v. American Federation of State, County and Municipal Employees, Council 31, et al.*, were sent via Next Day Service to the U.S. Supreme Court, and 3 copies were sent via Next Day Service and e-mail to the following parties listed below, this 18th day of January, 2018:

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I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on January 18, 2018.

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

Date:

Notary Public

[seal]

NULIE ANNE KERSHNER Nutary Public, State of Ohio My Commission Expires February 21, 2018