

No. 16-1466

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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.*

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**CERTIFICATE OF COMPLIANCE**

Lisa W. Pau, a member of the Bar of this Court and an attorney for *amicus*, pursuant to Rule 33.1(h) hereby certifies that the Brief of the Laborers' International Union of North America as *Amicus Curiae* in Support of Respondents complies with the pertinent word limitations. The body of the document, including footnotes (but exclusive of all material preceding the Interest of Amicus and all material following the last word of the text of the conclusion), contains 7,472 words.



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Lisa W. Pau

January 18, 2018