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, Nicole G. Berner, a member of the bar of this Court, certify that the accompanying Brief of Los Angeles County's Department of Health Services, NYC Health + Hospitals, and Service Employees International Union as Amici Curiae Supporting Respondents contains 8974 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Dated: January 19, 2018

Nicole G. Berner General Counsel

Services Employees International Union

1800 Massachusetts Ave., NW

Washington, DC 20036 Counsel for Amici Curiae Supporting Respondents