No. 16-1466

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 certify that the accompanying Brief of the National Education Association et al. as Amici Curiae in Support of Respondents contains 8,527 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

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January 19, 2018