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.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the BRIEF OF THE NEW YORK CITY MUNICIPAL LABOR COMMITTEE AS AMICUS CURIAE IN SUPPORT OF RESPONDENTS contains 8,999 words, excluding parts of the document 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 the 18th day of January 2018.

Alan M. Klinger

Counsel of Record

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