

IN THE
Supreme Court of the United States

No. 16-1466

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

Pursuant to this Court's Rule 33.1(h), I hereby certify that the Brief of the American Federation of Government Employees as *Amicus Curiae* in Support of Respondents contains 5,386 words, excluding parts of the document that are exempted by Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 19, 2018.

/s/ Jeffrey A. Lamken
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