## 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 SERVICE

I, Andrew J. Pincus, counsel for Constitutional Law Scholars and a member of the Bar of this Court, certify that on this 19th day of January, 2018, I caused three copies of the Brief of the Constitutional Law Scholars as *Amicus Curiae* in Support of Respondents to be served by overnight mail and electronic means on the following:

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I further certify that all parties required to be served have been served.

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Andrew J. Pincus