## 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 WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Brief for the International Association of Machinists and Aerospace Workers as *Amicus Curiae* in support of Respondents was prepared using Century 12-point typeface and contains 5, 249 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 19, 2018.

Respectfully submitted

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