## CERTIFICATE OF COMPLIANCE

No. 16-1495

CITY OF HAYS, KANSAS,

Petitioner,

v.

18

4,4

MATTHEW JACK DWIGHT VOGT,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Amicus Curiae Brief for the American Federation of Government Employees and the American Federation of Teachers in Support of Respondent Vogt contains 2,338 words, excluding the parts of the reply 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 December 19, 2017.

ANDRES M. GRAJALES\*
Deputy General Counset
American Federation Of
Government Employees, AFL-CIO
80 F Street, N.W.
Washington, D.C. 20001
Grajaa@afge.org
(202) 639-6426

\* Grayanal of Bassard for AECE

\* Counsel of Record for AFGE