In the Supreme Court of the United States

Mark Janus, Petitioner,

ν.

American Federation of State, County and Municipal Employees, Council 31, et al., Respondents.

On Petition for Writ of Certiorari to the United States Court of Appeals for the Seventh Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition for Respondents Kwame Raoul and Janel L. Forde contains 1,704 words, excluding the 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 May 11, 2020.

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