

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 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 PETITIONER'S SUPPLEMENTAL BRIEF in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 890 words, excluding the parts 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 September 4, 2020.

/s/ William L. Messenger

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