

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 the SUPPLEMENTAL BRIEF FOR RESPONDENT AFSCME COUNCIL 31 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 1,177 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 11, 2020.

/s/ John M. West

JOHN M. WEST

(Counsel of Record)

BREDHOFF & KAISER, P.L.L.C.

805 15th Street N.W.

Suite 1000

Washington, DC 20005

202.842.2600

jwest@bredhoff.com

Counsel for Respondent AFSCME Council 31