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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

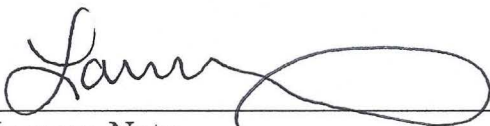
**CERTIFICATE OF SERVICE**

I, Lauren Noto, of lawful age, upon my oath state that I did, on the 11th day of September, 2020, serve an electronic copy of the SUPPLEMENTAL BRIEF FOR RESPONDENT AFSCME COUNCIL 31 in the above-entitled case to all parties required to be served, who consented to electronic service only:

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I certify under penalty of perjury that the foregoing is true and correct.

  
Lauren Noto

Executed on September 11, 2020