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No. 20-1603

SUSAN BENNETT,  
Petitioner,

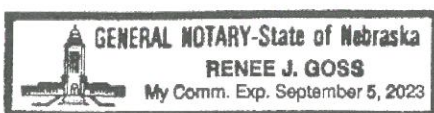
v.

AMERICAN FEDERATION OF STATE, COUNTY  
AND MUNICIPAL EMPLOYEES, COUNCIL 31, et al.,  
Respondents.

### CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF GOLDWATER INSTITUTE AND CATO INSTITUTE AS AMICI CURIAE SUPPORTING PETITIONER in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 3867 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 26th day of August, 2021.  
I am duly authorized under the laws of the State of Nebraska to administer oaths.



*Renee J. Goss*  
\_\_\_\_\_  
Notary Public

*Andrew H. Cockle*  
\_\_\_\_\_  
Affiant