No. 20-1603

In the Supreme Court of the United States

SUSAN BENNETT, Petitioner,

v.

AMERICAN FEDERATION OF STATE, COUNTY, AND MUNICIPAL EMPLOYEES, COUNCIL 31, AFL-CIO, ET AL., Respondents.

On Petition for a 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 State Respondents Kwame Raoul, Andrea Waintroob, Judy Biggert, Gilbert O'Brien Jr., Lynne Sered, and Lara Shayne contains 458 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 September 23, 2021.

Jane Elinor Notz

100 West Randolph Street

Chicago, Illinois 60601

(312) 814-5376

jane.notz@ilag.gov

Counsel for State Respondents