No. _____

In the Supreme Court of the United States

BRETT HENDRICKSON,

PETITIONER,

V.

AFSCME COUNCIL 18;

MICHELLE LUJAN GRISHAM, IN HER OFFICIAL CAPACITY AS GOVERNOR OF NEW MEXICO; AND

HECTOR BALDERAS, IN HIS OFFICIAL CAPACITY AS ATTORNEY GENERAL OF NEW MEXICO,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari in *Hendrickson v. AFSCME Council 18* contains 4,898 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 May 13, 2021

<u>/s/ Brian K. Kelsey</u> Brian K. Kelsey *Counsel of Record* LIBERTY JUSTICE CENTER 208 LaSalle St., Ste. 1690 Chicago, IL 60604 (312) 637-2280 bkelsey@libertyjusticecenter.org