SUPREME COURT OF THE UNITED STATES No. 20-1606X
BRETT HENDRICKSON,
Petitioner,
v.
AFSCME COUNCIL 18, et al.,
Respondents.
CERTIFICATE OF COMPLIANCE
As required by Supreme Court Rule 33.1(h), I certify that the document contains 1,859 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 this 8th day of October 2021.
J. J.
Sworn to and subscribed before me 8 <sup>th</sup> day of October 2021.

Julian Hadiz

Mariana Bruh roh

MARIANA BRAYLOVSKIY
Notary Public State of New York
No. 01BR6004935
Qualified in Richmond County
Commission Expires March 30, 2022