No. 21-1454

## IN THE SUPREME COURT OF THE UNITED STATES

THE OHIO ADJUTANT GENERAL'S DEPARTMENT, et al.,

Petitioners,

v.

FEDERAL LABOR RELATIONS AUTHORITY,

Respondent,

and

AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES, LOCAL 3970, AFL-CIO,

Intervenor-Respondent.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Andres M. Grajales, a member

of the Bar of this Court, hereby certify that the Brief of the Intervenor-Respondent,

American Federation of Government Employees, Local 3970, AFL-CIO contains 12,

337 words, excluding the parts of the brief that are exempted by Supreme Court

Rule 33.1(d).

Respectfully submitted,

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December 9, 2022