

**In the
Supreme Court of the United States**

THE OHIO ADJUTANT GENERAL'S DEPARTMENT, ET AL.,

Petitioners,

v.

FEDERAL LABOR RELATIONS AUTHORITY, ET AL.,

Respondents.

ON WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Brief for the American Federation of Labor and Congress of Industrial Organizations and Laborers' International Union of North America as Amici Curiae in Support of Respondents was prepared using Century 12-point typeface and contains 7,623 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). This certificate was prepared in reliance on the word count function of the word-processing system used to prepare the document. I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

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