No. 21-1454

In the Supreme Court of the United States

THE OHIO ADJUTANT GENERAL'S DEP'T ET AL., Petitioners,

v.

FEDERAL LABOR RELATIONS AUTHORITY ET AL., Respondents.

CERTIFICATE OF COMPLIANCE

I, Charles A. Rothfeld, counsel for *Amici Curiae* Military Law Scholars and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this Brief for *Amici Curiae* Military Law Scholars Supporting Respondents contains 7950 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Charles A. Rothfeld

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