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January 10, 2022

Scott S. Harris, Clerk
United States Supreme Court
One First Street, N.E.
Washington, DC 20543

Re: *Woods, et al., v. Alaska State Employees Association / AFSCME Local 52, et al.*,
No. 21-615

Dear Mr. Harris:

I write on behalf of Respondent Alaska State Employees Association / AFSCME Local 52 ("ASEA") to supplement ASEA's Brief in Opposition, which was filed today, January 10, 2022. In footnote 1, the Brief in Opposition cites eight petitions for certiorari that this Court recently denied raising the same question presented about the enforceability of union membership agreements. Earlier today, January 10, 2022, after the Brief in Opposition was submitted to the printer for printing, filing, and service, this Court denied a ninth petition for certiorari that raised the same question presented. *See Anderson, et al. v. Service Emps. Int'l Union Local 503, et al.*, No. 21-609.

By copy of this letter, I am serving counsel of record for all parties by email and U.S. mail.

Respectfully submitted,

Scott A. Kronland

Scott A. Kronland
Counsel for Respondent Alaska State Employees
Association / AFSCME Local 52

Scott S. Harris, Clerk
United States Supreme Court
Re: *Woods v. Alaska State Employees Association / AFSCME Local 52*, No. 21-615
January 10, 2022
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