

No. 16-1466

In The
Supreme Court of the United States

Mark Janus, *Petitioner*

v.

**American Federation of State, County, and
Municipal Employees, Council 31, et al.,
*Respondents***

On Appeal from the United States District Court
of Appeals for the Seventh Circuit

Supreme Court Rule 33.1(h) Certification

As required by Supreme Court Rule 33.1(h), I certify that the document filed with this certification (*Brief of Amicus Curiae James Madison Center for Free Speech, Inc.*) contains 5,670 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d), according to the word count function of the word-processing program used to prepare it.

Dated: November 3, 2017



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