

No. 16-1466

In the Supreme Court of the United States

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MARK JANUS, PETITIONER

v.

AMERICAN FEDERATION OF STATE, COUNTY, AND
MUNICIPAL EMPLOYEES, COUNCIL 31, ET AL.

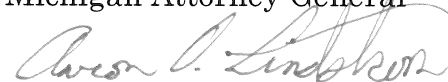
ON WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT

CERTIFICATE OF COMPLIANCE

Attorney for Amicus Curiae State of Michigan, hereby certifies that the foregoing Brief of Amici Curiae States of Michigan, Alabama, Arizona, Arkansas, Florida, Georgia, Idaho, Indiana, Kansas, Louisiana, Missouri, Nebraska, Nevada, Oklahoma, South Carolina, Tennessee, Texas, Utah, West Virginia, and Wisconsin in Support of Petitioner complies with the type-volume limitation of Supreme Court Rule 33.1(g)(xi), in that the word-processing system used to prepare the brief indicates that the brief contains 6,633 words.

Respectfully submitted,

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