IN THE Supreme Court of the United States

| MARK JANUS, |) | |
|--|-------------|-------------|
| Petitioner, |) | |
| v. |) | No. 16-1466 |
| AMERICAN FEDERATION OF STATE, COUNTY, AND MUNICIPAL EMPLOYEES, COUNCIL 31, et al., et al., |))) | |
| Respondents. |)) | |

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33.1(h), the undersigned certifies that the brief of Amici Curiae Center on National Labor Policy, Inc. and Ben Johnson complies with the type-volume limitations of Supreme Court Rule 33(g).

- 1. Exclusive of the exempted portions of the brief, as provided in Supreme Court Rule 33.1(c), this brief includes <u>5.780</u> words.
- 2. This Brief has been prepared in proportionally spaced typeface WordPerfect X7 in 12 point Century font for text. As permitted by Supreme Court Rule 33(h), the undersigned has relied upon the word count of this word-processing system in preparing this certificate.

Respectfully submitted,

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