
IN THE
Supreme Court of the United States

MARK JANUS,

Petitioner,

v.

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

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the Brief of Jason R. Barclay and James S. Montana, Jr., as Amici Curiae in Support of Petitioners in case 16-1466 contains 7364 words, excluding parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 5th day of December 2017.



DAVID L. APPLGATE
WILLIAMS MONTGOMERY & JOHN LTD.
6100 Willis Tower
233 South Wacker Drive
Chicago, IL 60606
(312) 443-3200
dla@willmont.com
