

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 16-1466

Mark Janus,

Petitioner,

v.


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

Respondents.

As required by Supreme Court Rule 33.1(h), I, Virginia A. Seitz, certify that the Brief Of Certified Public Accountants As Amici Curiae In Support Of Neither Party in the foregoing case contains 5,496 words, excluding the 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 December 6, 2017.


VIRGINIA A. SEITZ
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, DC 20005
(202) 736-8000