

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 Writ of Certiorari to the United States Court of Appeals for the Seventh
Circuit**

**BRIEF OF CORPORATE LAW PROFESSORS AS
AMICI CURIAE IN SUPPORT OF NEITHER PARTY**

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33(h), I hereby certify that this brief contains 8987 words as counted by Microsoft Word, and therefore complies with the word count limits set out in Rule 33. This brief was prepared in 12-point Century Schoolbook font, with footnotes in 10-point font.

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