

IN THE SUPREME COURT OF THE UNITED STATES

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No. 16-1466

MARK JANUS,  
*Petitioner,*

v.

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

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**CERTIFICATE OF WORD COUNT**

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Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief for Respondent American Federation of State, County, and Municipal Employees, Council 31, which was prepared using Century Schoolbook 12-point typeface, contains 14,954 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Office Word 2013) used to prepare the document.

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

Executed on January 12, 2018.



David C. Frederick  
*Counsel of Record for Respondent  
American Federation of State, County,  
and Municipal Employees, Council 31*