

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

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for the Petitioners, was prepared using Century 12-point typeface and contains 6,318 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system used to prepare the document.

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

Executed on January 18, 2018.

Respectfully submitted,



James B. Coppess
815 Sixteenth Street, NW
Washington, DC 20006
(202) 637-5337