



CERTIFICATE OF COMPLIANCE

Nos. 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 certify that the Brief of Steve Bullock, Governor of Montana, as *Amicus Curiae* in Support of Respondents contains 4,482 words, excluding the parts of the Brief 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 January 18, 2018.

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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: January 18, 2018

Julie Anne Kershner

Notary Public

[seal]



JULIE ANNE KERSHNER
Notary Public, State of Ohio
My Commission Expires
February 21, 2018