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January 18, 2018

Clerk
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20002

RE No. 16-1466 : MARK JANUS V. AMERICAN FEDERATION OF STATE, COUNTY, AND MUNICIPAL EMPLOYEES, COUNCIL 31, ET AL.

Dear Sir or Madam:

As a member of the Supreme Court Bar I hereby certify that at the request of counsel for Senators Sheldon Whitehouse and Richard Blumenthal as *Amici Curiae*, on January 18, 2018, I caused service to be made pursuant to Rule 29 on the following counsel for the Petitioner and Respondents:

PETITIONER:

William L. Messenger
c/o National Right to Work
Legal Defense Foundation, Inc.
8001 Braddock Road, Suite 600
Springfield, VA 22160
wlm@nrtw.org

**RESPONDENTS LISA MADIGAN
AND MICHAEL HOFFMAN:**

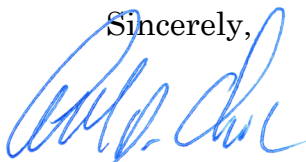
David Leigh Franklin
Office of the Attorney General of Illinois
100 West Randolph Street
Chicago, IL 60604
dfranklin@atg.state.il.us

**RESPONDENT AMERICAN
FEDERATION OF STATE, COUNTY,
AND MUNICIPAL EMPLOYEES,
COUNCIL 31:**

David C. Frederick
Kellogg, Hansen, Todd, Figel &
Frederick, P.L.L.C.
1615 M Street, NW, Suite 400
Washington, DC 20036
dfrederick@kellogghansen.com

This service was effected by depositing three copies of the Brief of Senators Sheldon Whitehouse and Richard Blumenthal as *Amici Curiae* in Support of Respondents in an official "first class mail" receptacle of the United States Post Office as well as by transmitting a digital copy via electronic mail.

Sincerely,



Arthur D. Chotin, Esq.
Principal