

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.

CERTIFICATE OF SERVICE

I, Brianne J. Gorod, do hereby declare that on January 19, 2018 as required by Supreme Court Rule 29.5, I have served by first-class mail, postage pre-paid, the Brief of Republican Current and Former State and Local Officeholders as *Amici Curiae* in Support of Respondents on counsel for each party to the above proceeding as follows:

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

Executed on January 19, 2018.

A handwritten signature in cursive script, reading "Brianne J. Gorod". The signature is written in black ink and is positioned above a horizontal line.

Brianne J. Gorod

Counsel for *Amici Curiae*