

CERTIFICATE OF COMPLIANCE

No. 16-1466

Mark Janus,

Petitioner(s),

v.

American Federation of State, County, And Municipal Employees, Council 31, et al.,

Respondent(s).

1. I am counsel of record for amicus Professor Sachs.

2. As required by Supreme Court Rule 33.1(h), I certify that this PROFESSOR BENJAMIN SACHS AMICUS AT MERITS STAGE (RESPONDENTS) contains 3595 words, including the parts of the brief that are required or exempted by Supreme Court Rule 33.1(d).

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



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