

No. 16-1466

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In the  
Supreme Court of the United States

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Mark Janus,

*Petitioner,*

v.

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

*Respondents.*

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CERTIFICATE OF COMPLIANCE WITH RULE 33.1(h)

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Pursuant to Supreme Court Rule 33.1(h), the undersigned certifies that this brief complies with the type-volume limitations of Rule 33.1(g).

1. Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains 8,600 words. (The undersigned is relying on the word-count utility in Microsoft Word 2016, the word-processing system used to prepare the brief, consistent with Rule 33.1(d)).
2. The brief was produced with Microsoft Word 2016 software in New Century Schoolbook Limited Standard 12-point typeface.

January 19, 2018

  
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Kevin K. Russell