

**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).*

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1. I am counsel of record for the Amicus Curiae "Fifteen Unions".

2. As required by Supreme Court Rule 33.1(h), I certify that this FIFTEEN UNIONS AMICUS AT MERITS STAGE (RESPONDENTS) contains 7546 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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