

IN THE SUPREME COURT OF THE UNITED STATES

No. 16-1466

MARK JANUS,

Petitioner,

V.

AMERICAN FEDERATION OF STATE, COUNTY, AND
MUNICIPAL EMPLOYEES, COUNCIL 31, *et al.*,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that, as computed by the word count function of Microsoft Word, the Brief of 24 Past Presidents of the D.C. Bar as *Amici Curiae* Supporting Respondents contains 6316 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on January 19, 2018.


John W. Nields, Jr.