

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.*,

*Respondent.*

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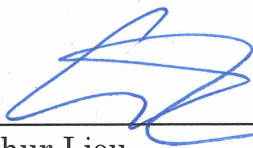
**CERTIFICATE OF WORD COUNT**

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As required by Supreme Court Rule 33.1(h), I certify that the accompanying Brief of *Amicus Curiae* on behalf of the National Conference on Public Employee Retirement Systems ("NCPERS") contains 8,040 words, excluding 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 18, 2018.

  
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