

**CERTIFICATE OF COMPLIANCE**

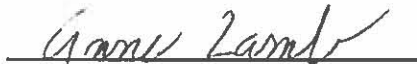
Case No. 16-1466

Caption: *Janus v. AFSCME Council 31, et al.*

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,752 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.

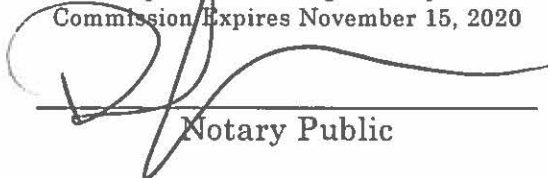
Executed on January 19, 2018.

  
\_\_\_\_\_  
Anne Lamb  
*Record Press, Inc.*

Sworn to before me on

January 19, 2018

RAMIRO A. HONEYWELL  
Notary Public, State of New York  
No. 01HO6118731  
Qualified in Kings County  
Commission Expires November 15, 2020

  
\_\_\_\_\_  
Notary Public