

STATE OF NEW YORK,                    )  
  ) SS:                73642                    AFFIDAVIT OF SERVICE  
COUNTY OF NEW YORK                )

Howard Daniels being duly sworn, deposes and says that deponent is not party to the action, and is over 18 years of age.

That on the 19th day of January 2018 deponent served 3 copies of the within

**BRIEF OF PROFESSORS CYNTHIA L. ESTLUND, SAMUEL ESTREICHER, JULIUS G. GETMAN, WILLIAM B. GOULD IV, MICHAEL C. HARPER, AND THEODORE J. ST. ANTOINE, AS AMICI CURIAE IN SUPPORT OF RESPONDENTS**

upon the attorneys at the addresses below, and by the following method:

**BY FEDERAL EXPRESS NEXT BUSINESS DAY DELIVERY AND ELECTRONIC MAIL**

**See Rider**

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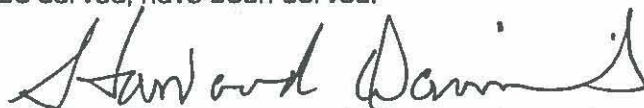
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*Attorneys for Respondents*  
*American Federation of State, County, and*  
*Municipal Employees, Council 31*

I, Howard Daniels, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, executed on January 19, 2018, pursuant to Supreme Court Rule 29.5(c). All parties required to be served, have been served.




Howard Daniels

**Sworn to me this**  
**January 19, 2018**  
NADIA R. OSWALD HAMID  
Notary Public, State of New York  
No. 01096101366  
Qualified in Kings County  
Commission Expires November 10, 2019

**Case Name:** Janus v. AFSCME Council 31, et al.

**Docket No.** 16-1466

  
Notary Public