

CERTIFICATE OF COMPLAINE

No. 16-1466

Mark Janus,

Petitioner,

v.

American Federation of State, County, and Municipal Employees, Council 31,
et al.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amici Curiae Labor Law & Labor Relations Professors In Support of Respondents (“Brief”) contains 8,480 words, excluding the parts of the Brief 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.

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