

**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.,

*Respondents.*

**CERTIFICATE OF COMPLIANCE**

I, Andrew J. Pincus, counsel for Constitutional Law Scholars and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that the Brief of Constitutional Law Scholars as *Amicus Curiae* in Support of Respondents contains 7,383 words, excluding the parts of the brief that are exempted by Rule 33.1(d).



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Andrew J. Pincus