

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 5,998 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.

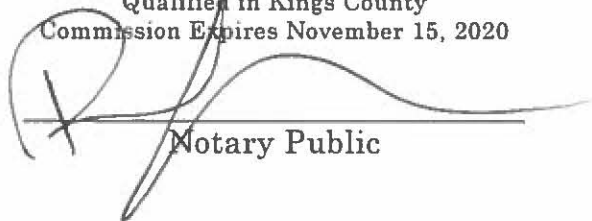


Anne Lamb
Record Press, Inc.

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