



CERTIFICATE OF COMPLIANCE

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 Amended Brief of Child Protective Service Workers and Their Representatives as Amici Curiae in Support of Respondents contains 5,012 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 23, 2018.

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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: January 23, 2018

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2018