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No. 19-1104

MARK JANUS,
Petitioner,

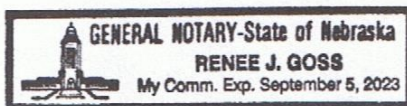
v.

AMERICAN FEDERATION OF STATE, COUNTY,
AND MUNICIPAL EMPLOYEES, COUNCIL 31, et al.,
Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF AMICI CURIAE GOLDWATER INSTITUTE, CATO INSTITUTE, AND MACKINAC CENTER FOR PUBLIC POLICY IN SUPPORT OF PETITIONER in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 2464 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 9th day of April, 2020.
I am duly authorized under the laws of the State of Nebraska to administer oaths.



Renee J. Goss
Notary Public

Andrew H. Cockle
Affiant

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