

IN THE  
*Supreme Court of the United States*

MARK JANUS,  
*Petitioner,*

v.

AMERICAN FEDERATION OF STATE, COUNTY, AND MUNICIPAL EMPLOYEES, COUNCIL  
31, ET AL.,  
*Respondents.*

**On Petition for Writ of Certiorari to the United States  
Court of Appeals for the Seventh Circuit**

**CERTIFICATE OF SERVICE**

I, William L. Messenger, of member of the bar of this Court, certify that on May 22, 2020 I emailed a copy of the PETITIONER'S REPLY BRIEF in the above entitled case to all parties required to be served, who are listed below and who consented to electronic service only, pursuant to this Court's order of April 15, 2020:

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I declare under penalty of perjury that the foregoing is true and correct.  
Executed on May 22, 2020

/s/ William L. Messenger  
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