

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, a member of the bar of this Court, certify that on September 4, 2020 I emailed a copy of PETITIONER'S SUPPLEMENTAL 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:

Kwame Raoul, Attorney General of Illinois
Jane Elinor Notz, Solicitor General
Frank H. Bieszczat, Assistant Attorney General
100 West Randolph Street,
Chicago, IL 60601
jnotz@atg.state.il.us
fbieszczat@atg.state.il.us

John M. West
Jacob Karabell
Bredhoff & Kaiser, PLLC
805 15th Street N.W., Suite 1000
Washington, DC 20005
jwest@bredhoff.com
jkarabell@bredhoff.com

I declare under penalty of perjury that the foregoing is true and correct.
Executed on September 4, 2020

/s/ William L. Messenger
William L. Messenger
c/o National Right to Work Legal Defense
Foundation, Inc.
8001 Braddock Road Suite 600
Springfield, VA 22160
(703) 321-8510
wlm@nrtw.org

Counsel for Petitioner Mark Janus