

No. 19-1401

IN THE
Supreme Court of the United States

APRIL HUGHES, ET AL.,
Petitioners,

v.


NORTHWESTERN UNIVERSITY, ET AL.,
Respondents.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, J. Peter Dowd, a member of the Bar of this Court, certify that the accompanying *Brief of Amicus Curiae* Service Employees International Union in Support of Petitioners in this proceeding contains 4,312 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 Sept. 10, 2021



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