

No. 20-1603

In the
Supreme Court of the United States

SUSAN BENNETT,

Petitioner,

v.

AFSCME, COUNCIL 31, AFL-CIO, et al.,

Respondents.

**On Petition for 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 certify that the BRIEF AMICUS CURIAE OF PACIFIC LEGAL FOUNDATION IN SUPPORT OF PETITIONERS contains 3,981 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 August 23, 2021.



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