

No. 20-1606

IN THE
Supreme Court of the United States

BRETT HENDRICKSON,

Petitioner,

v.

AFSCME COUNCIL 18, ET AL.,

Respondents.

On Petition for a Writ of Certiorari to the
United States Court of Appeals for the Tenth Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief In Opposition of Respondent AFSCME Council 18 in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point type for the text and 10 point for the footnotes, and that the brief complies with the word limit specified by Rule 33.1(g)(ii) because it contains 4004 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

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