

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33, I, Nicole Berner, hereby certify that I am a member in good standing of the Bar of this Court and that the Brief for Amici Curiae Service Employees International Union, et al., in Support of Respondent in No. 20-303, contains 5,831 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33(1)(d).



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