

---

In the Supreme Court of the United States

---

HELIX ENERGY SOLUTIONS GROUP, INC.;  
HELIX WELL OPS, INC.,

*Petitioners,*

v.

MICHAEL J. HEWITT,

*Respondent.*

---

BRIEF OF THE AMERICAN FEDERATION OF LABOR AND CONGRESS OF  
INDUSTRIAL ORGANIZATIONS AS *AMICUS CURIAE*  
IN SUPPORT OF RESPONDENT

---


---

CERTIFICATE OF WORD COUNT

---

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the American Federation of Labor and Congress of Industrial Organizations as *Amicus Curiae* in Support of Respondent was prepared using Century 12-point typeface and contains 7,732 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). This certificate was prepared in reliance on the word count function of the word-processing system used to prepare the document. I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,



---

Matthew J. Ginsburg  
(*Counsel of Record*)  
815 Black Lives Matter Plaza NW  
Washington, DC 20006  
(202) 637-5397

Executed on September 7, 2022