

**In the
Supreme Court of the United States**

M & K EMPLOYEE SOLUTIONS, LLC ET AL.,

Petitioners,

v.

TRUSTEES OF THE IAM PENSION FUND,

Respondent.

ON WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA

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 7,687 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.



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Executed on October 21, 2025