## In the Supreme Court of the United States

MARCUS TODD,

Petitioner,

v.

AMERICAN FEDERATION OF STATE, COUNTY AND MUNICIPAL EMPLOYEES, COUNCIL 5,

Respondent.

## CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Court Rules, I certify that the accompanying brief, which was prepared using Century Schoolbook 12-point typeface, and Century Schoolbook 10-point typeface for the footnotes contains 3,376 words, excluding the parts of the document exempted by Court Rule 33.1(d). This certificate was prepared in reliance on the wordcount function of the word processing system (Microsoft Word) used to prepare the document.

## Respectfully submitted,

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