

IN THE  
**Supreme Court of the United States**

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MARCUS TODD,  
*Petitioner,*

v.

AMERICAN FEDERATION OF STATE, COUNTY, AND MUNICIPAL EMPLOYEES, COUNCIL 5,  
*Respondent.*

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TERRY KLEE,  
*Petitioner,*

v.

INTERNATIONAL UNION OF OPERATING ENGINEERS,  
LOCAL 51, ET AL.,  
*Respondents.*

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ON PETITIONS FOR WRIT OF CERTIORARI TO THE  
UNITED STATES COURT OF APPEALS  
FOR THE EIGHTH AND NINTH CIRCUITS

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**BRIEF OF AMICUS CURIAE NATIONAL RIGHT TO  
WORK LEGAL DEFENSE FOUNDATION, INC., AND  
MACKINAC CENTER FOR PUBLIC POLICY IN SUPPORT  
OF PETITIONERS**

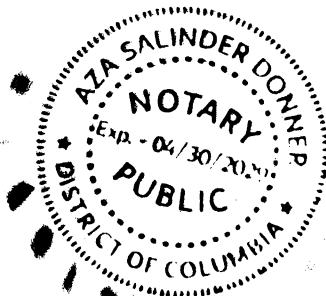
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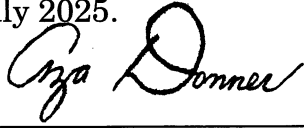
**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,779 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Sworn to and subscribed before me this 24th day of July 2025.



  
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AZA SALINDER DONNER  
NOTARY PUBLIC  
District of Columbia

My commission expires April 30, 2029.