
IN THE
Supreme Court of the United States

AVRAHAM GOLDSTEIN, MICHAEL GOLDSTEIN;
FRIMETTE KASS-SHRAIBMAN; MITCHELL LANGBERT;
JEFFREY LAX; MARIA PAGANO,

Petitioners,

v.

PROFESSIONAL STAFF CONGRESS/CUNY;
CITY UNIVERSITY OF NEW YORK; JOHN WIRENIUS,
in his official capacity as Chairperson of the
New York Public Employee Relations Board;
ROSEMARY A. TOWNLEY, in her official capacity as
Member of the New York Public Employee Relations
Board; ANTHONY ZUMBOLO, in his official capacity as
Member of the New York Public Employee Relations
Board; CITY OF NEW YORK; THOMAS DINAPOLI, in his
official capacity as New York State Comptroller,

Respondents.

**On Petition for Writ of Certiorari to the
United States Court of Appeals
for the Second Circuit**

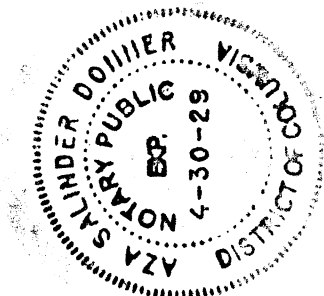
**BRIEF OF FREEDOM FOUNDATION
AS AMICUS CURIAE
IN SUPPORT OF PETITIONERS**

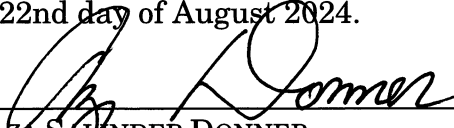
CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,514 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 22nd day of August 2024.





AZA SALINDER DONNER
NOTARY PUBLIC
District of Columbia

My commission expires April 30, 2029.