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September 12, 2025

Clerk
Supreme Court of the United States
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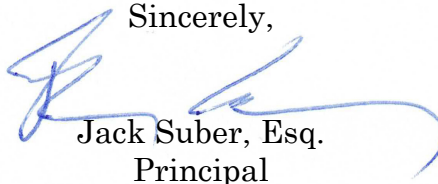
RE: 25-95: MICHAEL PUNG V. ISABELLA COUNTY, MICHIGAN

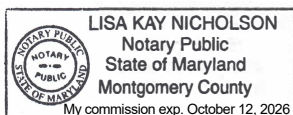
Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Petitioner's Reply Brief referenced above contains **1,467** 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.

Sincerely,


Jack Suber, Esq.
Principal



Sworn and subscribed before me this 12th day of September 2025.

