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No. 25-95

MICHAEL PUNG, PERSONAL REPRESENTATIVE OF THE ESTATE OF TIMOTHY SCOTT PUNG, Petitioner,

v.

ISABELLA COUNTY, MICHIGAN, Respondent.

AFFIDAVIT OF SERVICE

I HEREBY CERTIFY that on November 21, 2025, three (3) copies of the BRIEF OF JOSEPH DONALD BOURGEOIS AS *AMICUS CURIAE* IN SUPPORT OF PETITIONER in the above-captioned case were served, as required by U.S. Supreme Court Rule 29.5(c), on the following:

PHILIP LEE ELLISON OUTSIDE LEGAL COUNSEL PLC 530 West Saginaw St PO Box 107 Hemlock, MI 48626 (989) 642-0055

Party name: Michael Pung

MATTHEW T. NELSON WARNER NORCROSS + JUDD LLP 150 Ottawa Avenue NW Suite 1500 Grand Rapids, MI 49503 (616) 752-2539

Party name: County of Isabella, Michigan

DOUGLAS JAMES CURLEW CUMMINGS, McCLOREY, DAVIS & ACHO, P.L.C. 17436 College Parkway Livonia, MI 48152 (734) 261-2400

Party name: County of Isabella, Michigan

The following email addresses have also been served electronically:

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Sworn to and subscribed before me this 21st day of November 2025.

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AZA SALINDER DONNER

NOTARY PUBLIC District of Columbia

My commission expires April 30, 2029.