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December 1, 2025

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE NO. 25-95: MICHAEL PUNG, PERSONAL REPRESENTATIVE OF THE ESTATE OF TIMOTHY SCOTT PUNG V. ISABELLA COUNTY, MICHIGAN

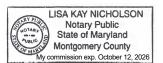
Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief for Petitioner referenced above contains **10,247** 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.

Sincerery,

Jack Suber, Esq. Principal



Sworn and subscribed before me this 1st day of December 2025.