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December 5, 2025

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

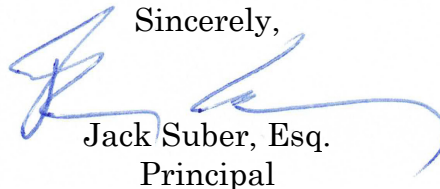
**RE NO. 25-95:      MICHAEL PUNG, PERSONAL REPRESENTATIVE OF THE ESTATE  
OF TIMOTHY SCOTT PUNG V. ISABELLA COUNTY, MICHIGAN**

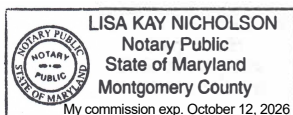
Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Professor Beth A. Colgan on referenced above contains **7,542** 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 )th day of 8YWa VYf 2025.

