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Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002 December 5, 2025

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

Dear Sir or Madam:

I certify that at the request of counsel for *Amicus Curiae* Professor Beth A. Colgan on December 5, 2025, I caused service to be made pursuant to Rule 29 on the following counsel for the Petitioner and Respondent:

## PETITIONER:

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## RESPONDENT:

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This service was effected by depositing three copies of the Brief of *Amicus Curiae* in an official "first class mail" receptacle of the United States Post Office as well as by transmitting a digital copy via electronic mail.

Sincerely

Jack Suber, Esq. Principal

LISA KAY NICHOLSON
Notary Public
State of Maryland
Montgomery County
My commission exp. October 12, 2026

Sworn and subscribed before me this 5th day of December 2025.

Lisa K Nicholson