

In the Supreme Court of the United States

No. 25-95

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

v.

ISABELLA COUNTY, MICHIGAN

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

In compliance with this Court's Rule 33.1(h), I, Samuel Gedge, a member of the Bar of this Court, certify that the Brief for the Institute for Justice as Amicus Curiae in Support of Petitioner in the above-captioned case contains 3,851 words, excluding the parts that are exempted by this Court's Rule 33.1(d).

Dated: December 8, 2025.

/s/ Samuel B. Gedge
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