IN THE

Supreme Court of the United States

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

Petitioner,

V

ISABELLA COUNTY, MICHIGAN,

Respondent.

AFFIDAVIT OF SERVICE

I HEREBY CERTIFY that all parties required to be served, have been served, on this 8th day of December, 2025, in accordance with U.S. Supreme Court Rule 29.3, three (3) copies of the foregoing **BRIEF FOR THE INSTITUTE FOR JUSTICE AS AMICUS CURIAE IN SUPPORT OF PETITIONER** by placing said copies in the U.S. mail, first class postage prepaid, addressed as listed below.

Philip L. Ellison Outside Legal Counsel PLC 530 West Saginaw Street P.O. Box 107 Hemlock, MI 48626 (989) 642-0055 pellison@olcplc.com Matthew T. Nelson Warner Norcross + Judd LLP 150 Ottawa Avenue NW Suite 1500 Grand Rapids, MI 49503 (616) 752-2539 mnelson@wnj.com

RAYMOND CHARLES CLARK

BYRON S. ADAMS, LEGAL & COMMERCIAL PRINTERS

1615 L Street, NW, Suite 100

Washington, DC 20036

(202) 347-8203

District of Columbia

Signed and sworn to (or affirmed) before me on 8th day of December, 2025.

EXP.-0G/14/2030

OTAPL

EXP.-0G/14/2030

AUBLIC

A/CT OF COLUMN

KAREN L. PIERANGELI

NOTARY PUBLIC, DISTRICT OF COLUMBIA My Commission Expires June 14, 2030.