

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.

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Constitutional Accountability Center as *Amicus Curiae* in Support of Petitioner contains 7,945 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.

Executed on December 8, 2025.

/s/ Brianne J. Gorod
Brianne J. Gorod
Counsel for *Amicus Curiae*