

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.

PROOF OF SERVICE

I, Brianne J. Gorod, do hereby declare that on December 8, 2025, as required by Supreme Court Rule 29.5, I have served by first-class mail, postage pre-paid, the Brief of Constitutional Accountability Center as *Amicus Curiae* in Support of Petitioner on counsel for each party to the above proceedings as follows:

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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*