

**AFFIDAVIT OF SERVICE**

SUPREME COURT OF THE UNITED STATES

No. 25-95

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

*Petitioner,*

*v.*

ISABELLA COUNTY, MICHIGAN,

*Respondent.*

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STATE OF NEW YORK           )  
COUNTY OF NEW YORK       )

I, Julie Connor, being duly sworn according to law and being over the  
age of 18, upon my oath depose and say that:

I am retained by Counsel of Record for *Amicus Curiae*.

That on the 8th day of December, 2025, I served the within Brief of  
The Mackinac Center Legal Foundation as *Amicus Curiae* in Support of  
Petitioner in the above-captioned matter upon:

Philip Lee Ellison  
Outside Legal Counsel PLC  
530 West Saginaw Street  
PO Box 107  
Hemlock, MI 48626  
989-642-0055  
pellison@olcplc.com  
*Counsel for Petitioner Michael Pung*

Matthew T. Nelson  
Warner Norcross + Judd LLP  
150 Ottawa Avenue NW, Suite 1500  
Grand Rapids, MI 49503  
616-752-2539  
mnelson@wnj.com  
*Counsel for Respondent County of Isabella, Michigan*

by sending three copies of same, addressed to each individual respectively, through U.S.P.S. Priority Mail. An electronic version was also served by email to each individual.

That on the same date as above, I sent to this Court forty copies of the within *Brief for Amicus Curiae* through the Two Day Federal Express, postage prepaid. In addition, the brief has been submitted through the Court's electronic filing system.

All parties required to be served have been served.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 8th day of December, 2025.

*Julie Connor*

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Julie Connor

Sworn to and subscribed before me  
this 8th day of December, 2025.

*Mariana Braylovsky*

**MARIANA BRAYLOVSKIY**  
Notary Public State of New York  
No. 01BR6004935  
Qualified in Richmond County  
Commission Expires March 30, 2026