

**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,*

-----X

STATE OF NEW YORK            )

COUNTY OF NEW YORK        )

I, Ann Tosel, 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 *Amici Curiae*.

That on the 8<sup>th</sup> day of December, 2025, I served the within *Amici Curiae Brief of the Buckeye Institute, National Federation of Independent Business Small Business Legal Center, Inc., Competitive Enterprise Institute, Mountain States Legal, Illinois Policy Institute, and Owners’ Counsel of America In Support of Petitioner* in the above-captioned matter upon:

Philip Lee Ellison  
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by sending three copies of same, addressed to each individual respectively, through 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 *Amici Curiae Brief of the Buckeye Institute, National Federation of Independent Business Small Business Legal Center, Inc., Competitive Enterprise Institute, Mountain States Legal, Illinois Policy Institute, and Owners' Counsel of America In Support of Petitioner* through the Second 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 8<sup>th</sup> day of December, 2025.



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Ann Tosel

Sworn to and subscribed before me  
this 8<sup>th</sup> day of December, 2025.



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

