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December 8, 2025

Clerk
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20002

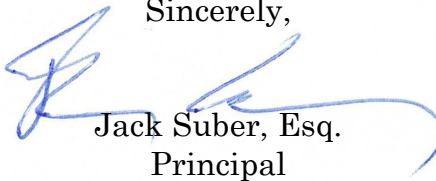
**RE NO. 25-95: MICHAEL PUNG, PERSONAL REPRESENTATIVE OF THE ESTATE
OF TIMOTHY SCOTT PUNG V. ISABELLA COUNTY, MICHIGAN**

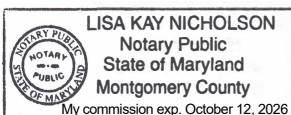
Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Legal Services of New Jersey on referenced above contains **7,161** 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.

Sincerely,


Jack Suber, Esq.
Principal



Sworn and subscribed before me this, 11, day of 8YWa VVf 2025.

