

No. 25-95

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.

WORD COUNT CERTIFICATION

As required by Supreme Court Rule 33.1(h), I certify that the document contains 6,193 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.

Rita L. Hemenway

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