

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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CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 1,930 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 this 8th day of December, 2025.

Julie Connor

Julie Connor

Sworn to and subscribed before me
on 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