

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.*

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the **BRIEF OF CITIZEN ACTION DEFENSE FUND, MANHATTAN INSTITUTE, REASON FOUNDATION, AND OREGON PROPERTY OWNERS ASSOCIATION AS AMICI CURIAE IN SUPPORT OF PETITIONER** in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains **3,413** words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

DECEMBER 8, 2025

/S/ SAM SPIEGELMAN  
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