

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 Tosal, 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 8th day of December, 2025, I served the within *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-captioned matter upon:

Philip Lee Ellison
Counsel of Record
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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 *Brief of Citizen Action Defense Fund, Manhattan Institute, Reason Foundation, and Oregon Property Owners Association as Amici Curiae In Support of Petitioner* through the Overnight Next 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.

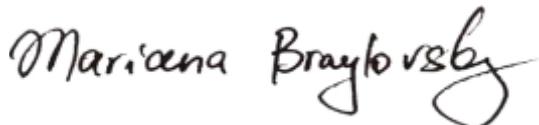
I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 8th day of December, 2025.



Ann Tosal

Sworn to and subscribed before me
this 8th day of December, 2025.



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