

No. 25-95

IN THE

**Supreme Court of the United States**

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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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**WORD COUNT CERTIFICATION**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,687 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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