

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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## CERTIFICATE OF SERVICE

I, Rita L. Hemenway of Bateman & Slade, Inc., hereby declare that on this eighth day of December 2025, I have served three (3) true copies of the Brief of Amicus Curiae Pioneer New England Legal Foundation in Support of Petitioner by priority mail, postage prepaid, addressed as follows:

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Signed under the pains and penalties of perjury,

*Rita L. Hemenway*

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NOTARIZED BY:

*George D. Bateman*

George D. Bateman/My Commission Expires: May 26, 2026