

No. 25-95

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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 WORD COUNT**

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Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Amicus Brief, which was prepared using Century Schoolbook 12-point typeface, contains 4,282 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

/s/ Daniel R. Suhr  
Co-counsel for Amici &  
Member of the Court's Bar