

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 COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for National Association of Realtors®, Michigan Realtors®, Wisconsin Realtors® Association, and American Property Owners Alliance in Support of Petitioner as *Amici Curiae* in *Pung v. Isabella Cnty, Mich.*, No. 25-95, complies with the word limitations, as it contains 5,234 words, excluding the words exempted by Supreme Court Rule 33.1(d).

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

Date: December 8, 2025

  
Brinton Lucas