

CERTIFICATE OF COMPLIANCE

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

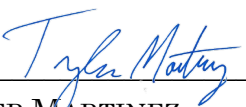
*Petitioner,*

*v.*

ISABELLA COUNTY, MICHIGAN,

*Respondent.*

\_\_\_\_\_  
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* National Taxpayers Union Foundation in Support of Petitioner in the above-entitled case contains 3,288 words, as measured by the word processing software and excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). I, Tyler Martinez, declare under penalty of perjury that the foregoing is true and correct. Executed on December 8, 2025.

  
\_\_\_\_\_  
TYLER MARTINEZ

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