

CERTIFICATE OF SERVICE
No. 25-95

IN THE
Supreme Court of the United States

MICHAEL PUNG,
Personal Representative of the Estate of
Timothy Scott Pung

Petitioner,

v.

ISABELLA COUNTY, MICHIGAN,

Respondent.

I, Tyler Martinez, do hereby certify that on December 8, 2025, three copies of the Brief of *Amicus Curiae* National Taxpayers Union Foundation in Support of Petitioner in the above-entitled case were mailed, first class postage prepaid to:

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I further certify that all parties required to be served have thereby been served.



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