

**AFFIDAVIT OF SERVICE**

SUPREME COURT OF THE UNITED STATES

No. 25-95

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

*Petitioner,*

*v.*

ISABELLA COUNTY, MICHIGAN,

*Respondent,*

-----X

STATE OF NEW YORK )

COUNTY OF NEW YORK )

I, Ann Tosel, being duly sworn according to law and being over the age of 18, upon my oath depose and say that:

I am retained by Counsel of Record for *Amici Curiae*.

That on the 11<sup>th</sup> day of December, 2025, I served the within *Brief of Citizen Action Defense Fund, Manhattan Institute, Reason Foundation, and Oregon Property Owners Association as Amici Curiae In Support of Petitioner* in the above-captioned matter upon:

Philip Lee Ellison  
*Counsel of Record*  
Outside Legal Counsel PLC  
530 West Saginaw St  
PO Box 107  
Hemlock, MI 48626  
pellison@olcplc.com  
Ph: 989-642-0055

Matthew T. Nelson  
*Counsel of Record*  
Warner Norcross + Judd LLP  
150 Ottawa Avenue NW  
Suite 1500  
Grand Rapids, MI 49503  
mnelson@wnj.com  
Ph: (616) 752-2539

by sending three copies of same, addressed to each individual respectively, through Priority Mail. An electronic version was also served by email to each individual.

That on the same date as above, I sent to this Court forty copies of the within *Brief of Citizen Action Defense Fund, Manhattan Institute, Reason Foundation, and Oregon Property Owners Association as Amici Curiae In Support of Petitioner* through the Overnight Next Day Federal Express, postage prepaid. In addition, the brief has been submitted through the Court's electronic filing system.

All parties required to be served have been served.

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

Executed on this 11<sup>th</sup> day of December, 2025.



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Ann Tosel

Sworn to and subscribed before me  
this 11<sup>th</sup> day of December, 2025.



**MARIANA BRAYLOVSKIY**  
Notary Public State of New York  
No. 01BR6004935  
Qualified in Richmond County  
Commission Expires March 30, 2026

