

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, MICH.,  
*Respondent.*

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*On Writ of Certiorari to the  
United States Court of Appeals for the Sixth Circuit*


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DECLARATION OF WORD COUNT

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Today, I, Peyman Roshan, pursuant to Rule 33.1(h) of the Rules of this Court, prepared for printing the document received from counsel titled **BRIEF OF *AMICI CURIAE* CYRUS SANAI AND PEYMAN ROSHAN IN SUPPORT OF PETITIONER MICHAEL PUNG** using Century Schoolbook 12-point typeface, which contains 7,693 words, excluding the parts of the document that are exempted by Rule 33.1(d). This count is made in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 8, 2025.

  
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Peyman Roshan