

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.*

---

ON WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS  
FOR THE SIXTH CIRCUIT

---

**CERTIFICATE OF COMPLIANCE**

---

As required by Supreme Court Rule 33.1(h), I hereby certify that I am a member in good standing of the bar of this Court and that Respondent County of Isabella's Brief contains 12,931 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d), and complies with the word limitation established by Supreme Court Rule 33.1(g)(vi).

Dated: January 12, 2026

  
Matthew T. Nelson

---