

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.*

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

**CERTIFICATE OF WORD COUNT FOR  
BRIEF OF OAKLAND COUNTY AS *AMICUS*  
*CURIAE* IN SUPPORT OF RESPONDENT**

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**CERTIFICATE OF WORD COUNT**

I, William H. Horton, certify that this document complies with Rule 33.1(h) of the Rules of this court, that the accompanying Brief of Oakland County as *Amicus Curiae* In Support of Respondent, which was prepared using Century Schoolbook 12-point typeface, contains 2,472 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft 365) used to prepare the document.

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

Dated: January 15, 2026

/s/ William H. Horton  
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