

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 Word Count

As required by Supreme Court Rule 33.1 (h), I certify that the **BRIEF OF NEW YORK ASSOCIATION OF TOWNS, NEW YORK CONFERENCE OF MAYORS AND MUNICIPAL OFFICIALS, AND NEW YORK STATE ASSOCIATION OF COUNTIES AS AMICI CURIAE IN SUPPORT OF RESPONDENT** in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 5,141 words, excluding the parts that are exempted by Supreme Court Rule 33.1 (d), as needed.

January 16, 2026

/s/Kathleen Hodgdon
KATHLEEN HODGDON
Counsel of Record
NEW YORK ASSOCIATION OF TOWNS
150 State Street
Albany, New York 12207
(518) 564-7933
khodgdon@nytowns.org