

SUPREME COURT OF THE UNITED STATES

No. 25-95

-----X  
Michael Pung, Personal Representative  
of the Estate of Timothy Scott Pung,

*Petitioner,*

v.

Isabella County, Michigan,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h),  
I certify that the document contains 5,683 words,  
excluding the parts of the document that are  
exempted by Supreme Court Rule 33.1(d).

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

Executed on this 20<sup>th</sup> day of January 2026



\_\_\_\_\_  
Joseph Alvarez

Sworn to and subscribed before me this 20<sup>th</sup> day of January 2026



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