

SUPREME COURT OF THE UNITED STATES

No. 25-95

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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 20th day of January 2026



Joseph Alvarez

Sworn to and subscribed before me this 20th day of January 2026



MARIANA BRAYLOVSKIY

Notary Public State of New York

No. 01BR6004935

Qualified in Richmond County

Commission Expires March 30, 2026