

AFFIDAVIT OF SERVICE

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.

-----X

STATE OF NEW YORK)

COUNTY OF NEW YORK)

I, Joseph Alvarez, being duly sworn according to law and being over the
age of 18, upon my oath depose and say that:

I am retained by Counsel of Record for ***Amicus Curiae National Tax
Lien Association.***

That on the 20th day of January 2026, I served the within ***Brief of
Amicus Curiae National Tax Lien Association in Support of
Respondent*** in the above-captioned matter upon:

Philip Lee Ellison
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by sending three copies of the same, addressed to each individual respectively, and enclosed in a properly addressed wrapper, through Federal Express, by Overnight Delivery.

An electronic version was also served by email to each individual.

That on the same date as above, I sent to this Court forty copies of the within ***Brief of Amicus Curiae National Tax Lien Association in Support of Respondent*** through Federal Express, by Overnight Delivery, postage prepaid.

In addition, the brief has been submitted through the Court's electronic filing system.

All parties required to be served have been served.

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

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