

**AFFIDAVIT OF SERVICE**

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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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 20<sup>th</sup> 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 20<sup>th</sup> day of January 2026



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Joseph Alvarez

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



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

# 131745