

**In the Supreme Court of the United States**

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MICHAEL PUNG, PERSONAL REPRESENTATIVE OF THE ESTATE OF TIMOTHY SCOTT PUNG,  
PETITIONER,

v.

ISABELLA COUNTY, MICHIGAN

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ON WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS  
FOR THE SIXTH CIRCUIT

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**CERTIFICATE OF COMPLIANCE**

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Attorneys for Amicus Curiae State of Michigan, hereby certifies that the foregoing Amicus Brief of Michigan, Ten Other States, and the District of Columbia in Support of Respondent complies with the type-volume limitation of Supreme Court Rule 33.1(xiii), in that the word-processing system used to prepare the brief indicates that the brief contains 5,456 words.

Respectfully submitted,

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