

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 5,726 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.


Loree Chow

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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