

**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, Loree Chow, 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 *Amici Curiae* Hennepin County,  
Minnesota and The Minnesota County Attorneys Association (MCAA).

That on the 20th day of January, 2026, I served the Brief of *Amici Curiae*  
Hennepin County, Minnesota and The Minnesota County Attorneys Association  
(MCAA) in Support of Respondent in the above-captioned matter upon:

Philip Lee Ellison  
Outside Legal Counsel PLC  
*Counsel for Petitioner*  
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Matthew T. Nelson  
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*Counsel for Respondent*  
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by sending three copies of same, addressed to each individual listed above respectively,  
through Federal Express Overnight Mail, postage prepaid. 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 Brief of *Amici Curiae* Hennepin County, Minnesota and The Minnesota County Attorneys Association (MCAA) in Support of Respondent through Federal Express Overnight Mail, 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.

  
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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