

IN THE
Supreme Court of the United States

MICHAEL PUNG, Personal Representative of the
Estate of Timothy Scott Pung,

Petitioner,

v.

ISABELLA COUNTY, MICHIGAN,

Respondent.

**On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Sixth Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Meaghan VerGow, a member of the bar of this Court, hereby certify on this 20th day of January, 2026, that the Brief of the Local Government Legal Center, National Association of Counties, National League of Cities, International Municipal Lawyers Association, Government Finance Officers Association, and International City/County Management Association as *Amici Curiae* in Support of Respondent in the above-captioned case contains 5,222 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Meaghan VerGow
Meagan VerGow