

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 5,098 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 20<sup>th</sup> day of January, 2026.



\_\_\_\_\_  
Ann Tosel

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



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