

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

PROOF OF SERVICE

I, Kathleen N. Hodgdon, do hereby declare that on January 24, 2026, as required by Supreme Court Rule 29.5, I have served by first-class mail, postage pre-paid, three copies of the Brief of New York Association of Towns, New York Conference of Mayors and Municipal Officials, and New York State Association of Counties as Amici Curiae in Support of Respondent on counsel for each party to the above proceedings as follows:

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 24, 2026.

/s/ Kathleen N. Hodgdon

Counsel of Record for Amicus Curiae New York Association of
Towns