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February 10, 2026

Clerk
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20002

**RE 25-95: MICHAEL PUNG, PERSONAL REPRESENTATIVE OF THE ESTATE OF
TIMOTHY SCOTT PUNG V. ISABELLA COUNTY, MICHIGAN**

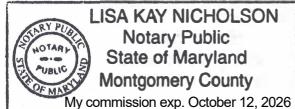
Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioners referenced above contains **5,979** 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.

Sincerely,

Jack Suber, Esq.
Principal



Sworn and subscribed before me this 10th day of February 2026.

Lisa K. Nicholson