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February 10, 2026

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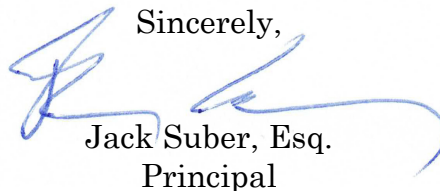
**RE 25-95: MICHAEL PUNG, PERSONAL REPRESENTATIVE OF THE ESTATE OF
TIMOTHY SCOTT PUNG V. ISABELLA COUNTY, MICHIGAN**

Dear Sir or Madam:

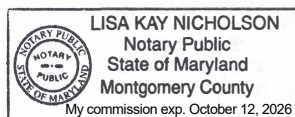
As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioners referenced above contains **5,979** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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.

