

IN THE  
**Supreme Court of the United States**

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NO. 25-417

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FRANCIS NIELSEN,,  
*Petitioner,*  
v.

KEKAI WATANABE,  
*Respondent.*

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

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**CERTIFICATE OF COMPLIANCE**

Pursuant to this Court's Rule 33.1(h), I hereby certify that the Reply for Petitioner contains 2,999 words, excluding parts of the document that are exempted by Rule 33.1(d).

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

Executed on January 20, 2026.



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