

IN THE
Supreme Court of the United States

No. 25-417

FRANCIS NIELSEN.,
Petitioner,
v.
KEKAI WATANABE,
Respondent.

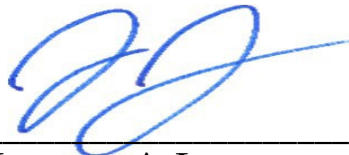
**On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Ninth Circuit**

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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