

IN THE
Supreme Court of the United States

No. 25-417

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

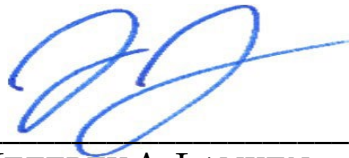
**On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Ninth Circuit**

CERTIFICATE OF COMPLIANCE

Pursuant to this Court's Rule 33.1(h), I hereby certify that the Supplemental Brief for Petitioner contains 546 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 February 13, 2026.



JEFFREY A. LAMKEN
Counsel of Record
MOLOLAMKEN LLP
The Watergate, Suite 500
600 New Hampshire Ave., N.W.
Washington, D.C. 20037
(202) 556-2000
jlamken@mololamken.com

Counsel for Petitioner