

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 SERVICE**

I hereby certify that on this 13th day of February, 2026, I caused three copies of the Supplemental Brief for Petitioner to be served on the counsel of record as follows:

By overnight delivery and email to:

Joshua M. Wesneski  
WEIL, GOTSHAL & MANGES LLP  
2001 M Street, N.W.  
Washington, D.C. 20036  
(202) 682-7000  
joshua.wesneski@weil.com

*Counsel for Respondent*

I hereby certify that all parties required to be served have been served. 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*