

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:

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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.



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