

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

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FRANCIS NIELSEN, PETITIONER

*v.*

KEKAI WATANABE

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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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**SUPPLEMENTAL BRIEF FOR RESPONDENT**

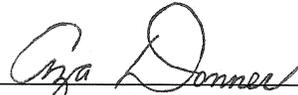
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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 596 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sworn to and subscribed before me this 17th day of February 2026.



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AZA SALINDER DONNER

NOTARY PUBLIC

District of Columbia

My commission expires April 30, 2029.

