

IN THE
Supreme Court of the United States

No. 25-417

FRANCIS NIELSEN,
Petitioner,

v.

KEKAI WATANABE,
Respondent.

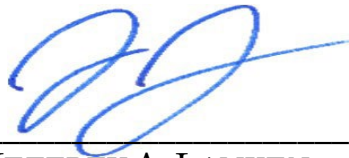
**On Writ of Certiorari
to the United States Court of Appeals
for the Ninth Circuit**

CERTIFICATE OF COMPLIANCE

Pursuant to this Court's Rule 33.1(h), I hereby certify that the Brief for Petitioner contains 12,992 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 August 14, 2026.



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