

IN THE
Supreme Court of the United States

FRANCIS NIELSEN,
Petitioner,
v.

KEKAI WATANABE,
Respondent.

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

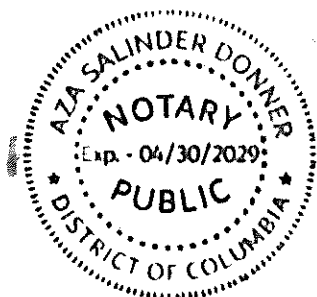
**BRIEF OF *AMICUS CURIAE*
ELAINE MITTLEMAN
IN SUPPORT OF PETITIONER**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 3,506 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 21st day of August 2026.





AZA SALINDER DONNER
NOTARY PUBLIC
District of Columbia

My commission expires April 30, 2029.