

No. 25-417

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*

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Cato Institute as *Amicus Curiae* in Support of Petitioner contains 4,721 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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