

IN THE
Supreme Court of the United States

FRANCIS NIELSEN,

Petitioner,

v.

KEKAI WATANABE,

Respondent.

CERTIFICATE OF SERVICE

I, Brianne J. Gorod, do hereby declare that on September 30, 2026, as required by Supreme Court Rule 29.5, I have served by first-class mail, postage pre-paid, the Brief of Constitutional Accountability Center as *Amicus Curiae* in Support of Respondent on counsel for each party to the above proceeding as follows:

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I declare under penalty of perjury that the foregoing is true and correct.
Executed on September 30, 2026.



Brianne J. Gorod
Counsel for *Amicus Curiae*