

SUPREME COURT OF THE UNITED STATES

No. 25-417

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FRANCIS NIELSEN,

Petitioner,

v.

KEKAI WATANABE,

Respondent.
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CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Professor Stephen I. Vladeck as Amicus Curiae in Support of Respondent contains 5,354 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

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

Executed on September 30, 2026.

/s/ Brandon L. Boxler

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