

In The  
**Supreme Court of the United States**

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FRANCIS NIELSEN,

*Petitioner,*

v.

KEKAI WATANABE,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I, Jaba Tsitsuashvili, counsel of record for Amicus Curiae and a member of the Bar of this Court, certify that the Brief for the Institute for Justice as Amicus Curiae Supporting Respondent in the above-captioned case contains 7,987 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), and that it complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12-point font for the text and 10-point font for the footnotes.

September 30, 2026

s/ Jaba Tsitsuashvili

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