

IN THE
Supreme Court of the United States

FRANCIS NIELSEN,

Petitioner,

v.

KEKAI WATANABE,

Respondent.

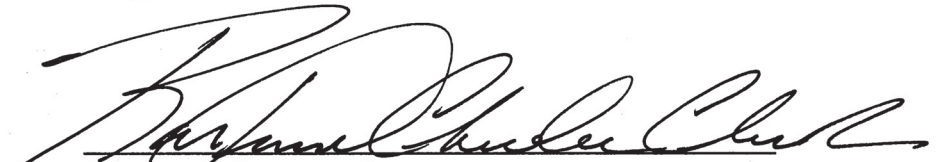
AFFIDAVIT OF SERVICE

I HEREBY CERTIFY that all parties required to be served, have been served, on this 30th day of September, 2026, in accordance with U.S. Supreme Court Rule 29.3, three (3) copies of the foregoing **BRIEF OF INSTITUTE FOR JUSTICE AS AMICUS CURIAE IN SUPPORT OF RESPONDENT** by placing said copies in the U.S. mail, first class postage prepaid, addressed as listed below. Copies of this brief were also electronically served.

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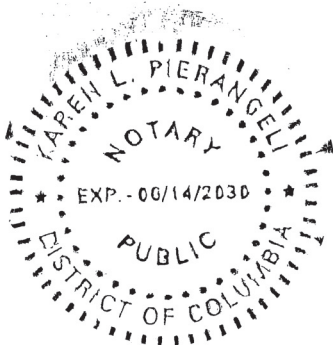
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Signed and sworn to (or affirmed) before me on 30th day of September, 2026.




KAREN L. PIERANGELI
NOTARY PUBLIC, DISTRICT OF COLUMBIA
My Commission Expires June 14, 2030.