

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*

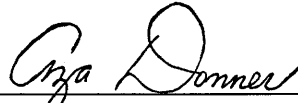
**BRIEF OF AMICI CURIAE PROFESSORS
JAMES E. PFANDER AND ALEXANDER A.
REINERT SUPPORTING RESPONDENT**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains **5,620** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sworn to and subscribed before me this 30th day of September 2026.



AZA SALINDER DONNER
NOTARY PUBLIC
District of Columbia

My commission expires April 30, 2029.

