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No. 25-417

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FRANCIS NIELSEN, PETITIONER,

*v.*

KEKAI WATANABE, RESPONDENT.

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### AFFIDAVIT OF SERVICE

I HEREBY CERTIFY that on September 30, 2026 three (3) copies of the BRIEF OF *AMICI CURIAE* PROFESSORS JAMES E. PFANDER AND ALEXANDER A. REINERT SUPPORTING RESPONDENT in the above-captioned case were served, as required by U.S. Supreme Court Rule 29.5(c), on the following:

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NOTARY PUBLIC  
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My commission expires April 30, 2029.

