
In the Supreme Court of the United States

FRANCIS NIELSEN, *Petitioner*,

v.

KEKAI WATANABE

On Writ of Certiorari
to the United States Court of Appeals
for the Ninth Circuit

BRIEF FOR NEUTRAL PRINCIPLES AND
PROJECT FOR PRIVACY & SURVEILLANCE
ACCOUNTABILITY, INC. AS *AMICI CURIAE*
SUPPORTING RESPONDENT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h) I, Erik S. Jaffe, a member of the Bar of this Court, certify that the BRIEF FOR NEUTRAL PRINCIPLES AND PROJECT FOR PRIVACY & SURVEILLANCE ACCOUNTABILITY, INC. AS *AMICI CURIAE* SUPPORTING RESPONDENT contains 5,155 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d) and complies with the word limitations set forth in Supreme Court Rule 33.1(g).

Dated: September 30, 2026

/s/ Erik S. Jaffe

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