

No. 25-417

FRANCIS NIELSEN, *Petitioner*,

v.

KEKAI WATANABE

CERTIFICATE OF SERVICE

I, Erik S. Jaffe, a member of the Bar of this Court, hereby certify that on September 30, 2026, the BRIEF FOR NEUTRAL PRINCIPLES AND PROJECT FOR PRIVACY & SURVEILLANCE ACCOUNTABILITY, INC. AS *AMICI CURIAE* SUPPORTING RESPONDENT was submitted to the Court's electronic filing system. Pursuant to U.S. Supreme Court Rule 29.3, at the time of filing all parties to the proceeding were served with an electronic copy; three paper copies will also be served by third-party commercial carrier for delivery within 3 calendar days, on the following:

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