

No. _____

ORIGINAL

IN THE
SUPREME COURT OF THE UNITED STATES

FILED
JAN 11 2023
OFFICE OF THE CLERK
SUPREME COURT, U.S.

Ernest A DAVIS — PETITIONER
(Your Name)

Government Employees vs.
Insurance Company et al — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

The California Supreme Court
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Ernest A Davis
(Your Name)

PO Box 420249
(Address)

San Diego CA 92142
(City, State, Zip Code)

(858) 869-4422
(Phone Number)

Questions Presented

- 1) Are judges in a trial court and justices in an appeals court and state supreme court in civil proceedings required to report direct evidence of crimes to the appropriate authorities for potential criminal prosecution based upon a code of ethics /cannons or can they turn a blind eye and ignore such evidence?**

[Context: Evidence of civil torts are 2 single page documents: an email sent to the Appellant by Walters on 11/6/2014 and a single page Porsche technical document which are the corner stone documents of this lawsuit which is discussed in detail in the appellant's opening brief and reply brief, but simply ignored by judges and opposing counsel and not even mentioned in the Opinion.]

- 2) Does liberal leave to amend complaints, supported by case law apply to Black litigants as well as White litigants, or Whites only?**

[Context: This lawsuit was dismissed on the bases stated by the Honorable Judge Chad W. Firetag: "...the Court recognizes that case-law supports granting liberal leave to amend. The Court is also mindful that Plaintiff has recently substituted in counsel on March 25, 2019". The appellant is a Black person as was NOT granted "liberal leave to amend"

There is an explicit bias expressed by this judge in this statement (above) as understands case law supports liberal leave to amend but refuses to allow leave to amend for this Black litigant. This White judge dismisses GEICO from the case during a hearing where an attorney had substituted in on behalf of the Plaintiff/ Appellant to draft a THIRD AMENDED COMPLAINT. GEICO never had to answer the Third amended complaint. The Appellant scheduled a hearing for reconsideration on 10/31/2019 to be heard

concurrently with the hearing on the demurrer involving the last 2 defendants of this case. A day before the scheduled during the Appellant received an email (on 10/30/2019) from opposing counsel stating that the hearing for GEICO reconsideration as taken off of calendar. This judge then took Appellant's hearing out of turn and heard the matter involving the last 2 defendants as the FIRST hearing of the morning while the Appellant was NOT present in the courtroom. When the Appellant entered the court room at 8:32 am to 8:33 am on 10/31/2019, the bailiff told him his case was over, as the last 2 defendants (Mr. Castillon and Walters) had been dismissed . Moreover, the Appellant as 2 to 3 minutes late for the 10/31/2019 8:30 am because he was across the hall, desperately trying to convince the clerk to place GEICO back on calendar with the understanding that 10/31/2019 would be the last opportunity for a hearing. The Appellant took a photo of the docket before he existed the courtroom such that he has a time stamp on the phone showing that the hearing was listed as the THIRD case to be heard, which means the judge took his scheduled case OUT OF TURN, as the FIRST case of the day to be heard, purposely, to dismiss the case without hearing oral arguments from Appellant. Moreover, the Appellant has an ADA disability accommodation due to a speech impediment, such that the judge deliberating took the hearing out of turn to NOT accommodate his ADA disability. Moreover, a Black judge, who was initially assigned the case , GRANTED the Appellant leave to amend in a joinder action to add GEICO as a defendant, before the case was transferred to the White judge who quickly dismissed GEICO from the case with the Appellant's newly subbed in Attorney present.]

LIST OF PARTIES

All parties appear in the caption of the case on the cover page.

All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

Plaintiff/ Appellant:

Earnest A Davis

Defendants/Respondents:

GEICO is actually an abbreviation for Government Employees Insurance Company. Mr. Conrad

Castillon

Walters Auto Sales and Service, Inc.

RELATED CASES

California Supreme Court Case No. S277809 in connection with California Court of Appeals , Fourth District Division Two Case No. E077395 and California Superior Court, County of Riverside Case No. RIC 2001180 is currently under review.

TABLE OF AUTHORITIES CITED

CASES	PAGE NUMBER
County of Orange v. Smith (2005) 132 Cal. App.4th 1434.1444 Mesler v. Bragg Mgmt. Co., 39 Cal. 3d 290, 296 (1985)	
Morgan v. Super. Ct., 172 Cal. App 2d 527, 530 (1959)	

STATUTES AND RULES

Cal. Civ. Proc. Code §473 (a) (1) Cal.
Civ. Proc. Code § 576.2 Cal. Civ.
Proc. Code § 389(a)(1) Cal. Civ.
Proc. Code § 379(a)

The California Chief Justice Tani G. Cantil-Sakauye issued the following statement on racial bias: "I am

deeply disturbed by the tragic deaths of George Floyd and others, as well as the action and inaction that led to these deaths. Justice is the first need addressed by the People in the preamble of our nation's Constitution. As public servants, judicial officers swear an oath to protect and defend the Constitution. We must continue to remove barriers to access and fairness, to address conscious and unconscious bias—and yes, racism. All of us, regardless of gender, race, creed, color, sexual orientation or identity, deserve justice. Our civil and constitutional rights are more than a promise, a pledge, or an oath—we must enforce these rights equally. Being heard is only the first step to action as we continue to strive to build a fairer, more equal and accessible justice system for all."

OTHER

A criminal prosecutor for the San Diego Office of the District Attorney called the Appellant as a favor for a friend and TOLD him after hearing his story that crimes of false pretenses were in fact committed against him but because the crime was not in their jurisdiction, they can not take action. Both the California Attorney General and the Riverside County Office of the District Attorney were contacted but both said they could take no action because the Bureau of Automotive Repair was the initial governmental agency to conduct the investigation such that only that agency can make the formal request for a criminal investigation;however, the investigators for this agency , also White, have ignored a letter from the NAACP & Appellant to take action and are the roadblock.

TABLE OF CONTENTS

OPTIONS BELOW.....	1
JURISDICTION.....	2
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED.....	3
STATEMENT OF THE CASE	4
REASONS FOR GRANTING THE WRIT.....	5
IGNORED EVIDENCE OF CRIMES (AND CIVIL TORTS).....	7
CONCLUSION.....	10

IN THE
SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix _____ to the petition and is

reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

The opinion of the United States district court appears at Appendix _____ to the petition and is

reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix A to the petition and is

reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

The opinion of the California Superior Court, County of Riverside court appears at Appendix C to the petition and is

reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

JURISDICTION

For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was _____.

No petition for rehearing was timely filed in my case.

A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. __ A _____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

~~For cases from state courts:~~

The date on which the highest state court decided my case was denied. A copy of that decision appears at Appendix D.

~~A timely petition for rehearing was thereafter denied on the following date: 9/6/2022, and a copy of the order denying rehearing appears at Appendix _____.~~

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. __ A _____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

In creating the Civil Rights Act of 1866, Congress was using the authority given it to enforce the newly ratified 13th Amendment, which abolished slavery, and protect the rights of Black Americans.

White employees at this nations second largest auto insurer, GEICO should be able to conspire with white employees at a Porsche dealership owned by Walters Auto Sales and Service, Inc., to commit crimes of false pretenses and insurance fraud simply because they resent that a Black man owns a flagship classic vehicle of Porsche. Judges and Justices should not pretend to not understand the significance of this email from the Porsche dealership which contains intentional FALSE representations in connection with an APPROVED insurance claim. This email was the basis used by the Porsche Dealership to sabotage the repair. This email is also the basis used by GEICO to devalue the vehicle. This email also the basis used by the Porsche Dealership to render the passenger compartment 'harnessless, WHICH IS AN ACT OF SABOTAGE.

The improper attempt of the tow truck operator to jumpstart the vehicle with the dead battery by placing jumper cables of a portable battery charger on the wrong car battery terminals, which damaged the passenger compartment wiring harness, which is connected to the car battery COULD NOT HAVE POSSIBLY CAUSED ISOLATED ELECTRICAL DAMAGE TO WIRING IN THE CONVERTIBLE TOP because the car battery is NOT connected to wires in the convertible top. These judges are pretending to not understand.

ONLY the Black judge: the Honorable Irma Poole Asberry grants the Black litigant leave to amend his complaint to add GEICO as a defendant to the lawsuit, before the case was reassigned to the White judge who dismissed GEICO from the action before dismissing the entire action. The 13th amendment was created to protect the rights of Blacks born in this country and not allow civil torts and crimes to be committed against Blacks born in this country.

There are real consequences for the court system not protecting the rights of Black citizens, as the vehicle is deemed a total loss on the basis of an inoperable convertible top which is not damaged at all because there are no melted wires in the convertible top. It makes no sense for GEICO to initially approve of a claim to fund the repair of the vehicle, only to abandon the repair and deem it a total loss, and then for GEICO and the Porsche dealership to agree to have the newly installed passenger compartment wiring harness removed without the consent or knowledge of Plaintiff/Appellant. Lastly, the investigators at the Bureau of Automotive Repair, who are also White, are the road block to justice as well because they are not responding to voicemails, text messages or certified letters written to their agency from the Appellant or the NAACP. They have closed the case and refused any further communication with the Appellant or the NAACP.

STATEMENT OF THE CASE

Background: a Black man (the Petitioner) owns a rare classic flagship automobile of Porsche :a 1998 Porsche 993 series 911 Carrera Cabriolet. The vehicle has a dead battery so he calls his auto insurer GEICO who dispatches a tow truck operator to jump start the vehicle. The association of a Black man with this pristine shiny convertible vehicle infuriates the tow truck driver so he purposely connects jumper cables to the WRONG car battery terminals during this improper attempt to jumpstart the vehicle, which damages the passenger compartment wiring harness which is located in the passenger compartment of the vehicle. The Black man has insurance so he files a claim which is APPROVED. The vehicle is towed to a Porsche dealership and the repair is attempted. As with the racist tow truck driver, employees at the Porsche dealership (Walters Auto Sales and Service, Inc., and the service manager Mr. Conrad Castillon) conspire with employees at the insurance company (Government Employees Insurance Company, i.e. GEICO) to create a reason to not fund the repair of the vehicle. The Porsche dealership sends the Black man an email (WHICH IS DIRECT EVIDENCE OF A CRIME) which essentially says that, while installing the new passenger compartment wiring harness into the vehicle a new problem was discovered in the convertible top that justifies not completing the repair in the passenger compartment, which are "melted wires in the top harness", so we have to let your insurance provider know. GEICO and Walters then agrees to strip the newly installed passenger compartment from the vehicle, rendering the passenger compartment "harnessless" and thus considerably more complex and costly to fix, and furthermore

,GEICO deems the vehicle a total loss, which reducing the value of the vehicle from a pre-loss value of \$107,522 to a salvage value of \$12,500. With the passenger compartment of the vehicle rendered "harnessless" no Porsche dealership will attempt to repair the vehicle because an 'installed' old harness is the 'roadmap' needed to install the new replacement harness, such that it now costs substantially more to redesign and rewire the harness system which an independent Porsche shop is capable of doing for a considerably higher price. The Black man requests that the State of California Bureau of Automotive Repair investigate the matter and this agency confirms that there are no melted wires in the convertible top and also understands, like the judges and justices do, that even if there were melted wires in the convertible top, it still would not justify NOT completing the task at hand of completing the installation of the new passenger compartment wiring harness that is needed to RENDER THE VEHICLE DRIVABLE AGAIN. Like the tow truck operator, employees at the Porsche dealership, and at GEICO, WITH ONE EXCEPTION, the trial judges and justices at the Court of Appeals and California Supreme Court pretend to not understand. That one EXCEPTION IS THE BLACK JUDGE: THE HONORABLE JUDGE IRMA POOLE ASBERRY OF THE SUPERIOR COURT OF THE COUNTY OF RIVERSIDE, who by the luck of the draw, as the first trial judge assigned to this case. This Black judge who is the only Black judge sitting on the bench, and only the second Black judge to sit on the bench in the entire history of the Riverside Histroric Courthouse, APPROVED THE PLAINTIFFS JOINDER MOTION TO AMEND THE COMPLAINT TO ADD GEICO

AS A DEFENDENT, before the case was reassigned to a white judge who quickly dismissed the case on the basis of refusing to grant liberal leave to amend as case law supports. Judge Firetag stated: "the Court recognizes that case-law supports granting liberal leave to amend. The Court is also mindful that Plaintiff has recently substituted in counsel on March 25, 2019". To be crystal clear, this White judge is sending a message to the Court of Appeals, to the California Supreme Court and to the US Supreme Court that Black litigants are NOT granted liberal leave to amend as White litigants are given. Moreover, this White judge dismissed GEICO from the case KNOWING that the Black trial judge who was assigned the case before him had add GRANTED the joinder motion to ADD this same defendant to the lawsuit. Moreover, in the Opinion issued by the Court of Appeals, the action of the Black trial judge was ignored and not even discussed. The email from the dealership is direct evidence of crimes of false pretenses and insurance fraud.

REASONS FOR GRANTING THE PETITION

Evidence of the settlement offer in the voicemail from Luis Ponce of the Bureau of Automotive Repair ("BAR") to the Appellant/ Plaintiff on 10/19/2020 at 3:10 PM which has been transcribed by

REV.COM below:

"Mr. Luis Ponce of the Bureau of Automotive Repair (00:01):
Mr. Davis, if you don't want to discuss the complaint, then I'm letting you know we're closing it. We're gonna put it in the master file, and we're not gonna pursue this any longer. Good luck. Um, there's an offer made by the shop. If you care to hear the offer, contact the field office, and I will call you. Thank you. Bye bye. "

This transcribed voicemail is direct evidence that the case has merit as the settlement offer was conveyed to the Plaintiff/ Appellant nearly a year it was dismissed from the trial court on 10/31/2019. The actual audio clip is in the cell phone of the Appellant /Plaintiff and readily available for review.

Why would this Porsche dealership offer a settlement to the Appellant/ Plaintiff after they prevailed in the civil lawsuit?, you might ask. The answer is because THEY KNOW THAT THEY COMMITTED CRIMES and they are afraid that, if the Appellant keeps pressing for the Bureau of Automotive Repair to do their job and forward the incriminating email of 11/6/2014 from Walters (along with other circumstantial evidence of crimes) to the Office of the District Attorney or the California Office of the Attorney General, or to the United States Attorney General, THEY MAY FACE JAIL TIME.

The context of that voicemail is as follows: After several years of pressing this corrupt agency to take action, Mr. Ponce finally agrees to inspect the convertible top of the vehicle in October of 2020, as part of this agencies THIRD INVESTIGATIN into this matter. Three times the charm because in October 2020, Mr. Luis Ponce met with Walters staff and begrudgingly inspected the vehicle which is still in the custody of Walters ,to 'officially discover' and proclaim what he knew years several ago but refused to report: THERE ARE NO MELTED WIRES IN THE TOP HARNESS. Being in possession of the email of 11/6/2014 from the Porsche dealership, Mr. Ponce is should be obligated to report evidence of crimes of false pretenses and insurance fraud, but he has compromised. This agency is inside of the crime tape. Like the tow truck operator who damaged the vehicle and like the employees at Walters and GEICO who conspired to create an excuse to not fund the repair of the vehicle, and like the White trial judge and 3 White associated justices at the Court of Appeals, Mr. Ponce is also resentful that a Black man owns this rare collectible vehicle. Mr. Ponce knows that the email of 11/6/2014 is evidence of crimes that HE WAS COVERED UP FOR YEARS so he knows that he may be investigated for his part in covering up these crimes for years. For this reason, he made the Appellant an offer that REVEALS IMPROPRIETY.

The offer is: the shop will offer a settlement if the Appellant agrees to stop pressing for the Bureau of Automotive Repair to make a formal recommendation to open a criminal investigation.

The Appellant refused that offer because it may only cost \$30,000 to repair the vehicle, but if GEICO is not ordered by a Court to direct the Department of Motor Vehicles ("DMV") to issue a non-salvage title for the vehicle, then the Appellant stands to lose much more than the cost to repair the vehicle if GEICO is not brought to justice as well. Only GEICO is authorized to contact the DMV to restore the non-salvage title for the vehicle. If the vehicle does not restore to its true value which requires GEICO to be ordered to direct the DMV to issue a non-salvage title for the vehicle, not only will the vehicle NOT regain its true value of \$107,522, but the vehicle will also NOT be able to continue to appreciate in value over the years as the last of the true Porsche Carrara 911's with its legendary air -cooled engine. For this reason, the Plaintiff/ Appellant DECLINED the offer and Ponce immediately hung up the phone after the Appellant rejected his offer. At that point, Mr. Ponce refused to return text messages, phone calls, voice messages, and even refused to respond to certified letters written by the NAACP who wrote the letter on behalf of the Appellant /Plaintiff.

The 13th Amendment must be enforced. Black people have rights. Civil trial judges and Civil associate justices at the Court of Appeal should be REQUIRED to report DIRECT EVIDENCE OF CRIMES which may arise from civil actions. Black litigants should be afforded the same liberal leave to amend as White litigants regarding the civil tort that is being ignored. In addition, the California Chief Justice Tani G. Cantil-Sakauye issued the following statement on racial bias:

"I am deeply disturbed by the tragic deaths of George Floyd and others, as well as the action and inaction that led to these deaths. Justice is the first need addressed by the People in the preamble of our nation's Constitution. As public servants, judicial officers swear an oath to protect and defend the Constitution. We must continue to remove barriers to access and fairness, to address conscious and unconscious bias—and yes, racism. All of us, regardless of gender, race, creed, color, sexual orientation or identity, deserve justice. Our civil and constitutional rights are more than a promise, a pledge, or an oath—we must enforce these rights equally. Being heard is only the first step to action as we continue to strive to build a fairer, more equal and accessible justice system for all."

Lastly, the related is a related case, coming down the pipeline, currently under review by the California Supreme Court. It's identified in this document. Walters, and their service manager, Mr. Conrad Castillon (both defendants in this case) conspired with Porsche Cars of North America (PCNA"), who is the exclusive importer of Porsche parts and Porsche automobiles, and conspired with the Stuttgart headquartered manufacturer of Porsche automobiles and Porsche parts (who are defendants in the related case) to create a single page document called a Porsche Parts Technical Assistance document, which essentially documents an emailed conversation between these three (3) 'Porsche entities: the Porsche dealership, PCNA, and Porsche AG, which essentially states that the auto part needed to replace the alleged " melted wires in the top harness" (as stated in the incriminating email of 11/6/2014 from Walters) is mysteriously missing from a box, is out of stock, and is discontinued without replacement. This single page Porsche technical document was emailed to the Appellant /Plaintiff and also provided to the Bureau of Automotive Repair during their initial investigation into this matter. NONE of the respondents /defendants in the related case responded to the complaint in a timely manner, and some of the respondents /defendants did NOT RESPOND AT ALL, such that the Plaintiff/ Appellant filed applications for request for entry of default . The White judges refused to process the standard California CIV-100 default request forms. To be clear, these forms provides 2 option for the judge. The judge can either check a box to approve of the default request, or the judge can check a box to deny the request and STATE THE REASON FOR THE DENIAL, on a line next to the box for denial, BUT THE CORRUPT WHITE TRIAL JUDGES DID EITHER!

IGNORED EVIDENCE OF CRIMES (AND CIVIL TORTS)

The following email and Porsche Parts Technical Assistance document are not just evidence of civil torts but direct evidence of crimes, including crimes of false pretenses and insurance fraud.

The repair of the vehicle was attempted in connection with an approved insurance claim, and the newly installed new passenger compartment wiring harness was installed and only needed to be connected to all power sources when the Appellant received the following email with intentional false misinformation:

Walter's Porsche Service Consultant Adrian Madrid on November 6, 2014, at 7:48 AM from amadrid@waltersporsche.com "

"Good morning, We got the connectors in, but while we were installing them from the convertible top harness to the new harness we found that the top harness has also been melted in some spots. We have been trying to see if we could work around the melted wires in the top harness but there is too much damage to be able to guarantee you that it would work with no problems. The problem we have now is that Porsche no longer makes the convertible top harness, it has been discontinued. The only option we have is to try and find a used one. The bad part of using a used one is that we cannot provide any kind of warranty for it. I have to call your insurance company and let them know and see how they want us to handle it. I wanted to let you know first what's going on. I will contact them shortly and then let you know what they tell me."

To be crystal clear, the California Bureau of Automotive Repair has determined that no “connectors” were ever ordered or received by the Porsche dealership for installation and further determined that no “**melted wires in the top harness**” exists. The wiring in the convertible top is perfectly fine and were not affected by the improper attempt by the GEICO-dispatched tow truck operator to jumpstart the vehicle on 8/6/2014. The White trial judges and the 2 White associate justices are IGNORING THIS DIRECT EVIDENCE OF CRIMES, while the Black judge who reviewed the case file GRANTED LEAVE for the Appellant to amend his complaint to ADD GEICO as a defendant in this lawsuit. This email is significant because it’s the basis that GEICO and Walters used to STOP the progress of the repair and for GEICO to deem the vehicle a total loss and for Walters to REMOVE the newly installed passenger compartment wiring harness which rendered the vehicle’s passenger compartment HARNESSLESS, and this significantly more complex and costly to repair. This single email literally SOLVES THE CRIME, but the White trial judge and the 3 White associate justices at the Court of Appeals are DOWNPLAYING the significance of this 2 key pieces of DIRECT evidence of civil torts and crimes of false pretenses and insurance fraud!

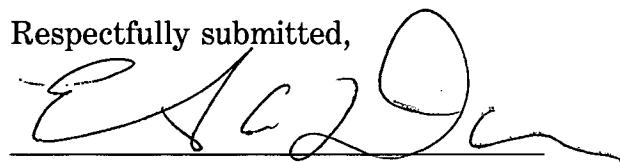
In the related case, coming down the pipeline, the following single page Porsche Technical document implicates 1) Porsche Cars of North American (“PCNA”) for FALSELY stating that auto part to replace the alleged “**melted wires in the top harness**” are out of stock, 2) Porsche automobile manufacturer Porche AG for FALSELY stating that the auto part to replace the alleged “**melted wires in the top harness**” is discontinued without replacement, 3) the Porsche dealership is asking the question in the “*inquiry*” section of the document :why is the auto part for the convertible top harness (i.e., the auto part that connects to the electric motors or “cabrio top motors “ that actuate the convertible top)

mysteriously missing from the box?. PCNA has knowledge about Porsche parts imported into North America and responds by stating that the auto part is out of stock **WHICH IS FALSE**. Porsche AG has knowledge of the manufacturing of auto parts and **FALSELY** states that that the auto part is discontinued. How does one know that this information is **FALSE**?, you might ask. They answer lies in the **TIMESTAMPS** of this Porsche Technical document, which essentially documents an emailed conversation between these three (3) Porsche entities using a Porsche proprietary email system. as these Porsche entities are inquiring about the availability of an auto part between 10/22/2014 to 10/28/2014 (according to the timestamps of the sent emails of the document) but the alleged discovery of **“melted wires in the top harness”** did not occur until 11/6/2014 (according to the timestamp on the email sent to the Appellant. These 2 pieces of evidence leads right to the culprits. Again, the Black trial judge (Asberry) gets it, but the White trial (Firetag) and the 3 associate justices, as well opposing counsel are ignoring the significance of these 2 cornerstone documents of the lawsuit due to racial bias, as they just can't stomach the reality that a Black man owns this rare collectable high-performance flagship vehicle of Porsche . To be clear, because I am a Black litigant, the Court of appeals believes that they don't have to address the issue of these 2 pieces of evidence in their Opinion, and they also feel that they don't have to discuss the solid legal basis for the Black judge granting the joinder action to add GEICO as a defendant. Isn't the reason rather obvious being that GEICO is the appellants auto insurer, and being that GEICO is directly liable for the damage to the vehicle being that the tow truck operator was dispatched by GEICO? Moreover , GEICO approved of the claim (that they reneged on) such that their behavior is further evidence that GEICO should not have been dismissed.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Escolano".

Date: 1/11/2023