

23 - 6407

No. \_\_\_\_\_

FILED

DEC 26 2023

OFFICE OF THE CLERK  
SUPREME COURT, U.S.

IN THE  
SUPREME COURT OF THE UNITED STATES  
1 First St NE, Washington, DC 20543

Nira Woods, Dr. — PETITIONER  
(Your Name)

vs.  
Department Of Housing And  
Community Development et al. — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

THE SUPREME COURT OF THE STATE OF CALIFORNIA

(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Nira Woods, Dr. – non-Attorney in proper  
(Your Name)

2550 Pacific Coast Hwy., #68,  
(Address)

Torrance, CA 90505  
(City, State, Zip Code)

T: 424-327-3610 E: niraschwartzwoods@yahoo.com  
(Phone Number)

## **QUESTION(S) PRESENTED**

**Question 1:**

**Is the Existence of the State Courts Interlocutory Order(s) in this case  
impairs / offense / invalidate my Federal Constitution and Due processes ?**

**Question 2:**

**Is the Existence of the State Courts Interlocutory OPINION in this case  
impairs / offense / invalidate Federal Constitution and Due processes ?**

**Question 3:**

**Is the Existence of the State Courts Interlocutory Exhibits in this case  
impairs / offense / invalidate Federal Constitution and Due processes ?**

## LIST OF PARTIES

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

[X] 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:

### Respondents / Defendants LIST:

1. Department of Housing and Community Development:  
failed to appear Represented by: A.G. Robert Andres Bonta;  
300 S. Spring Street, Ste 1702, Los Angeles, CA 90013; Rob.Bonta@doj.ca.gov;  
Jamil Radwan Ghannam, Bruce Donald McGagin, and Jeffrey Phillips all are at:  
Dept. of Justice/Tort & Condemnation 1300 I Street, 12th Floor, Sacramento, CA  
90581; jamil.ghannam@doj.ca.gov; bruce.mcgagin@doj.ca.gov;  
Jeffrey.Phillips@doj.ca.gov;

2. N & K Commercial Property, Inc.

Ken Miyake, individual; Victor G. Manuel Guzman,  
Individual are represented by: Rick L Peterson, Bremer & Rene Chrun  
Bremer; Bremer Whyte Brown & O'Meara LLP

20320 SW Birch Street, 2nd Floor, Newport Beach, CA 92660  
rpeterson@bremerwhyte.com ; rchrun@bremerwhyte.com

3. Jon Megeff, individual, Torrance Police Department and Department of Mental Health City of Torrance are represented by: Jeanne-Marie Kathleen Litvin City of Torrance City Attorney's Office, 3031 Torrance Blvd Torrance, CA 90503;

jlitvin@torranceeca.gov; psullivan@torranceeca.gov;

4. Robin Famighetti, individual Represented by:  
Sarah Lee Overton Cummings McClorey Davis & Acho,  
3801 University Ave Ste 560, Riverside, CA 92501 ; soverton@cmda-law.com;

5. Dowdall Law Offices, A.P.C., Represented by: Maureen A. Levine Dowdall  
Law Offices, 284 N Glassell St, Orange, CA 92866; [mahl@dowdalllaw.com](mailto:mahl@dowdalllaw.com);

6. Mailing Address of the Solicitor General of the United States  
(see Rule 29.4) Room 5616, Department of Justice,  
950 Pennsylvania Avenue, N. W. Washington, DC 20530-0001

## RELATED CASES

1. US Supreme 23-6334 Woods v. Department Of Housing And Community Dev.
2. S282126 Woods v. Department Of Housing And Community Dev.
3. (People v. Nesler (1997) 16 Cal.4th 561, 579.)
4. (Carter v. Kentucky (1981) 450 U.S. 288; Hicks v. Oklahoma (1980) 447 U.S. 343.), (Estelle v. McGuire (1991) 502 U.S. 62, 75 .);
5. (Crane v. Kentucky (1986) 476 U.S. 683, 687-692.)
6. (Darden v. Wainright (9th Cir. 1986.)
7. (Arizona v. Fulminante (1991) 499 U.S. 279, 309-310;
8. Rose v. Clark (1986) 478 U.S. 570, 577-578.)
9. (Estelle v. McGuire, *supra*, 502 U.S. at p. 75, quoting Lisenba v. California (1941) 314 U.S. 219, 228).

## TABLE OF CONTENTS

OPINIONS BELOW .....	1
JURISDICTION.....	2
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED .....	3
STATEMENT OF THE CASE .....	4
REASONS FOR GRANTING THE WRIT .....	6
CONCLUSION.....	7

## INDEX TO APPENDICES

APPENDIX A 2023/09/28 California Appeal Court Interlocutory OPINION

APPENDIX B 2023/10/06 California Appeal Court Interlocutory Order  
re: 2023/09/29 Petition for Review & Rehearing OPINION

APPENDIX C 2023/12/13 California Supreme Court Interlocutory Order  
deny Petition for Review

APPENDIX D 2023/12/15 and 2023/11/20 California Supreme two Interlocutory  
Letter(s) /blocked my efforts to file Petition for rehearing

APPENDIX E LIST OF PARTIES

APPENDIX F 2023\_02\_28 1st Interlocutory Letter of Exhibits disappearance

APPENDIX G 2023\_10\_26 2nd Interlocutory Letter of Exhibits disappearance

APPENDIX H 2020\_09\_28 Interlocutory Order Prioritize Rights of Employee  
Defendant 20 over my Federal Constitution Rights

## TABLE OF AUTHORITIES CITED

CASES	PAGE NUMBER
(Carter v. Kentucky (1981) 450 U.S. 288; Hicks v. Oklahoma (1980) 447 U.S. 343.), (Estelle v. McGuire (1991) 502 u.s. 62, 75 .) (Estelle v. McGuire, <i>supra</i> , 502 U.S. at p. 75, quoting Lisenba v. California (1941) 314 u.s. 219, 228).	6
(Estelle v. McGuire, <i>supra</i> , 502 U.S. at p. 75, quoting Lisenba v. California (1941) 314 u.s. 219, 228).	5
STATUTES AND RULES	3-6
The 1st; 4th; 5th; 6th; 7th; 14th; 15th; US Constitutional amendment	
OTHER	

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 petition for review is denied.

The opinion of the IN THE SUPREME COURT OF CALIFORNIA 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 on 12/13/2023. A copy of that decision appears at Appendix C \_\_\_\_\_.

A timely petition for rehearing was thereafter denied on the following date: 12/15/2023, and a copy of the order denying rehearing appears at Appendix D Letters on 2023/12/15 & on 11/20/2023 returned to me my Petition for Rehearings.

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**

- A. Article III of the Constitution power the of US Supreme Court
- B. Article VI, Paragraph 2 of the U.S. Constitution establishes it take precedence over state laws, and even state constitutions.
- C. "An interlocutory judgment or order is a provisional determination of some or all issues in the cause." (7 Witkin, Cal. Procedure, *supra*, Judgement, § 12, p. 548.) (CCP § 872.720.) provisional order means an order that is not effective until confirmed by a court; ("ordonnance conditionnelle")
- D. The 1st; 4th; 5th; 6th; 7th; 14th; 15th; US Constitutional amendment
- E. US Constitutional amendment-14/05-procedural-due-process-civil.  
Right to be "heard" without qualifications in front of all live Justice(s); at one Court Room. 760 Fuentes v. Shevin, 407 U.S. 67, 80-81 (1972).
- F. Superior Court case 20trcv00564, the Complaint dated 08/11/2020, p. 4; and the FAC dated 02/26/2021, p. 4; and the 2AC dated on 07/26/2021, p. 3, par. 1; all of those were:  
"... filed under Equitable Relief / State Laws / Federal Laws and Federal Constitution ("LAW").

## STATEMENT OF THE CASE

### 1. IN THE SUPREME, Appeal, Superior Court(s) OF CALIFORNIA

Appendix H - On 2020\_09\_28 Interlocutory Order prioritize Defendant 20  
(a court reporter) rights (over my rights) and in response  
without qualifications said interlocutory Order on its p. 1 ruled:  
"The Court recuses itself on this case", impairs / offense /  
invalidate my Federal Constitution and Due processes;

Said interlocutory order, case 20trcv00564 establish the case name to be:

"Woods v. Department of Housing and Community Development et al."

Said interlocutory order caused the transferred of the case out of Torrance Court house and into Burbank Courthouse; it was not to include said transfer of the Defendant Housing and Community Development et al. (the State Defendant); because the State A.G. failed to Answer the Complaint for nearly two year failed to appear ; despite the State A.G. was properly served with the Summons and complaint; so when the said interlocutory Order was issued it could NOT included the said transfer of the State Defendant as part of 20trcv00564 case from Torrance Courthouse to Burbank Courthouse;

Said transfer was followed by INTERLOCUTORY ACTS to place the missing A.G. into the Appeal cases: B317221/ B318393, to including the use of: Interlocutory OPINION; Interlocutory Docket; Defendants Interlocutory responses to my opening brief by amending and using new interlocutory case Name;

And such was made so intrinsic miscarriage of justice and so egregious that it offends federal due process under Federal Constitution; to including the 1st, 4th, 5th, 6th, 14th Amendments.

(Carter v. Kentucky (1981) 450 U.S. 288; Hicks v. Oklahoma (1980) 447 U.S. 343.),  
(Estelle v. McGuire (1991) 502 U.S. 62, 75 .)

Communication between Petitioner and A.G. office Attorneys is recorded as Email communication case 20trcv00564 Exhibit 82 (filed on on 10/03/2022 12:00 AM) and Exhibit 82A; both disappeared from the Burbank Courthouse twice);  
said INTERLOCUTORY ACTS to including the below:

2. IN THE SUPREME, Appeal, Superior Court(s) OF CALIFORNIA

said INTERLOCUTORY ACTS to including the below:

Appendix A - On 2023/09/28 California Appeal Court Interlocutory OPINION

was issued by two valid Panel members, and the Interlocutory Presiding Panel member that was already presiding and priori ruled on same issues raised on appeal by emergency motions in case B317221 on: 07/26/2022; 06/23/2023; 06/26/2023; 06/27/2023; 06/28/2023; 06/29/2023; 06/30/2023; 07/07/2023; said Interlocutory Presiding has impairs / offense / invalidate my Federal Constitution and Due processes;

Mandatory CCP 585(b), 585(c), 989, etc.; was rejected/Relaxed; when the State A.G. failed to Answer the Complaint for two years; created Interlocutory Order(s) rulings that impairs / offense / invalidate my Federal Constitution and Due processes; denied me relief along CCP 585(b), 585(c), 989, etc.;

Case B317221 - Docket on 06/09/2023 show Respondent's brief by City of Torrance Attorney: Jeanne-Marie Kathleen Litvin used interlocutory case name: "N&K COMMERCIAL PROPERTY, INC. et al.," while my case name is "Woods v. Department of Housing and Community Development et al.;" created said Interlocutory OPINION to non case of mine; impairs / offense / invalidate my Federal Constitution and Due processes; response to no case of mine;

Case B317221 - Docket on 06/10/2023 Respondent's brief by: N & K Commercial Property, Inc. using interlocutory case name: "N & K Commercial Property, Inc.,Ken Miyake,Victor Guzman, and Manuel Guzman" while my case name is "Woods v. Department of Housing and Community Development et al.;" created said Interlocutory OPINION to non case of mine; impairs / offense / invalidate my Federal Constitution & Due processes; response to no case of mine;

Case B317221 - Docket presents case name Woods v. Department of Housing and Community Development et al.;" the docket also records Attorney Litvin at the City of Torrance is representing the State defendant in this case; state NOT represented by missing State A.G.; created said Interlocutory OPINION to non case of mine;

The said INTERLOCUTORY ACTS impairs / offense / invalidate my Federal Constitution and Due processes; an effort to dismiss the case, instead of reassign the case to Federal Court; therefor transferring this case out of Torrance Court house, to Burbank Courthouse, was made so intrinsic miscarriage of justice and so egregious that it offends federal due process under Federal Constitution; to including the 1st, 4th, 5th, 6th, 14th Amendments.

(Carter v. Kentucky (1981) 450 U.S. 288; Hicks v. Oklahoma (1980) 447 U.S. 343.).

(Estelle v. McGuire (1991) 502 U.S. 62, 75.)

Case 20trcv00564 on 08/11/2020 Complaint p. 4; on 02/26/2021 1AC p. 4; and on the 02/26/2021, p. 3; all were filed under Equitable Relief / State Laws / Federal Laws and Federal Constitution ("LAW")

3. IN THE SUPREME, Appeal, Superior Court(s) OF CALIFORNIA

additional said INTERLOCUTORY ACTS to including the below:

Appendix F - 2023\_02\_28 1st Letter of Interlocutory Exhibits disappearance

Appendix G - 2023\_10\_26 2nd Letter of Interlocutory Exhibits disappearance

Appendix A - 2023/09/28 California Appeal Court Interlocutory OPINION

The Interlocutory Appendices F&G, identified: interlocutory Exhibits of mine that were no longer accessible by the State Court(s) of California; simply disappeared from the face of the earth; and with reasonable probability their authenticity was no longer preserved; produce interlocutory request upon me to be the custodian of records of this case. where I am 77 years old and neither want this job nor trust the defendants to be (8000 pages of documents). And such is impairs / offense / invalidate my Federal Constitution and Due processes;

(hereafter: "Interlocutory Exhibits")

The Demurrers to the First Amended Complaint (1AC) and the Second Amended complaint (2AC) have been granted / sustained under said Interlocutory Exhibits STATUS;

## **REASONS FOR GRANTING THE PETITION**

1. This case is in the interest of large number of people that are in pro-per non attorneys, that request to be protected by our Federal Constitution and Due processes while still wish to be in State Court. and since economy is difficult, cause large number of non attorneys in pro-per that can not afford an attorney to seek justice by themselves; it became a National Importance; to preserve our Federal Constitution and Due process in State Courts that we in Pro-per non-Attorneys deprive.
2. The interlocutory Orders, interlocutory OPINION, Interlocutory Exhibits, Interlocutory docket in this case created / resulted in cumulative / repeated impairs / offense/invalidate of the Federal Constitution and Due process that took place in the state courts should convince the Hon. US Supreme Court to grant this PETITION FOR WRIT OF CERTIORARI;  
(Carter v. Kentucky (1981) 450 U.S. 288; Hicks v. Oklahoma (1980) 447 U.S. 343.), (Estelle v. McGuire (1991) 502 u.s. 62, 75 .)
3. THE EXISTENCE IN THIS CASE OF THE STATE COURT'S interlocutory Orders, interlocutory OPINION, Interlocutory Exhibits, Interlocutory docket, and the repeated CUMMALITIVE disappearance of State Court Exhibits, IMPAIRS ANY PRO-PER NON ATTORNEY APPELLANT OF THIS CASE AND MAKES IT IMPRACTICAL AND IMPOSSIBLE TO PROCEED FURTHER AND HAVE JUSTICE IN THE STATE COURT(S);

## **CONCLUSION**

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Woods (Jood) S

Date: 12/26/2023