

No. 14-314

In The  
**Supreme Court of the United States**

PAUL SILADI,

*Petitioner,*

v.

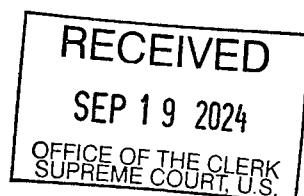
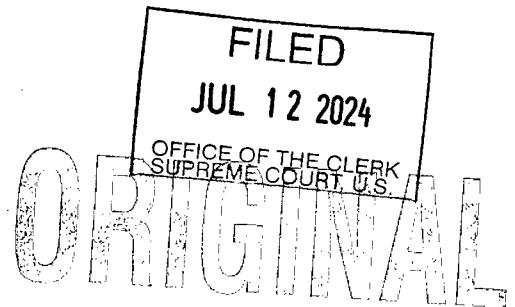
DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE FOR WAMU MORTGAGE  
PASS-THROUGH CERTIFICATE SERIES 2005-AR-6,

*Respondent.*

On Petition For Writ Of Certiorari  
To The Connecticut Supreme Court

**PETITION FOR WRIT OF CERTIORARI**

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## QUESTIONS PRESENTED

1. Whether the Connecticut Supreme Court's Order Denying Petitioner's Petition for Certification to Appeal to that Court which upheld the Connecticut Superior Court and Connecticut Appellate Court orders and judgments nullifies Petitioner's due process rights including a trial or evidentiary hearing, which never occurred, as guaranteed by the 5<sup>th</sup> and Section one of the 14<sup>th</sup> Amendment to the United States Constitution.
2. Whether the Connecticut Supreme Court's Denial of the Petitioner's Petition to Appeal for Certification upholding the Connecticut Superior and Connecticut Appellate Court's orders and judgments as to protection orders issued by the Superior Court at the request of Respondent denying Petitioner discovery as to the standing of the Respondent to pursue foreclosure of Petitioner's home.

## PARTIES TO THE PROCEEDINGS

Petitioner and Appellant Below:

Paul Siladi

Respondent and Appellee below:

Deutsche Bank National Trust Company, s  
Trustee For WAMU Pass-Through  
Certificate Series 2005=AR-6

## LIST OF THE PROCEEDINGS BELOW

Connecticut Supreme Court:

*Deutsche Bank National Trust Company as  
Trustee for WAMU Mortgage Pass-Through  
Certificate Series C 2005 5-AR-6 v. Paul Siladi,  
PSC 230135 (Conn.)*

Appellant/Defendant Petition for Certification  
To Appeal Denied. No written opinion or re-  
dress by the court despite Notice of issues.

Connecticut Appeal Court:

*Deutsche Bank and Trust Company as  
Trustee for WAMU Mortgage Pass-Through  
Certificate Series 2005-AR-6 v. Paul Siladi,  
AC46534 (Connecticut Court of Appeals).*

Appellant/Defendant Appeal to Judgment of  
Strict Foreclosure Denied. No written opinion  
despite notice of issues.

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## OPINIONS BELOW

The Connecticut Supreme Court Denial of the Petition for Certification to Appeal is at *Deutch Bank National Trust Company as Trustee for WAMU Mortgage Pass-Through Certificate Series 2005-AR-6 v. Siladi, Paul* PSC-230135 dated February 15, 2024 reproduced at App., 1 and 3. The Connecticut Supreme Court's Order denying petitioner's Motion to Stay Pending Decision by the United States Supreme Court is reproduced at App. 5. The Connecticut Appellate Court Order denying petitioner's Motion for Reconsideration En Banc dated June 26, 2023 is reproduced at App. 2.

## JURISDICTION

The Connecticut Supreme Court issued its final Order Denying Petition for Certification to Appeal on February 15, 2024. On March 11, 2024 Justice Sotomayor extended the time for filing this petition to and including July 12, 2024. Application No. 223A823 This Court has jurisdiction under 28 U.S.C. § 1257(a).

## CONSTITUTIONAL PROVISION INVOLVED

Amendment V of the United States Constitution:

The guarantee of due process requires the government to respect all rights, guarantees, and Protections affected by the U.S. Constitution and all applicable statutes before the government can deprive any person of life liberty or property.

Amendment 14 Section 1 of the United States Constitution:

All persons born or naturalized in the United States and subject to the jurisdiction thereof, are citizens of the United States and of the state wherein they reside. No state shall make or enforce any law which shall abridge any privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty or property, without process of law; nor deny to any person within the jurisdiction the equal protection of the laws.

#### **INTRODUCTION AND STATEMENT OF THE CASE**

This case is a judicial foreclosure action brought by Deutsche Bank National Trust Company as Trustee for WAMU Mortgage Pass-through Certificate Series 2005. Deutsche Bank was not the original owner of the note and mortgage. The original owner was Washington Mutual Bank, F.A. Deutsche Bank alleges it obtained the subject note and mortgage prior to initiating this foreclosure action on March 28,

2012, that the assignor JP Morgan Chase Bank, National Association alleged successor in interest by Purchase from the FDIC via an alleged purchase and assumption agreement dated September 25, 2008. On July 5, 2012 Petitioner (Siladi) filed answers and counter-claims against Deutsche Bank challenging its standing to initiate and pursue this foreclosure action.

On January 24, 2012 the United States Bankruptcy Court District of New Haven Connecticut Case #11-32614 in a chapter 7 Bankruptcy filing Discharged the Petitioner Paul Siladi as to any Obligations to the Note associated with the subject alleged Mortgage. Nevertheless fourteen months later this Mortgage Foreclosure action was commenced by Deutsche Bank by Summons and Complaint returnable to the Judicial District at New Haven on April 16, 2013, pleading entitlement to enforce the alleged Mortgage and Discharged Note. Deutsche Bank in its pleadings and motions to the several Connecticut Courts has never clarified that this foreclosure action cannot attempt by Order of the Bankruptcy court to enforce the discharged note.

Petitioner (Siladi) on July 5, 2015 filed his Answer and Special Defences to the Complaint in which he denied Deutsche Bank was owner of the note and mortgage. He further stated in his answer that:

Plaintiff in its complaint deceptively ignored to mention the actual person deemed owners

Clause of the Pooling and Servicing Agreement Which clearly states that the persons deemed Owners are the certificate owners. Therefore The plaintiff (Deutsche Bank) cannot be the Owner of the mortgage and note. Without Which they do not have standing to pursue this litigation.

On May 29, 2015, nearly two years after the initiation of the litigation, Deutsche Bank filed a motion for summary judgment, a procedural violation of Connecticut Practice Section 10-6 Pleadings Allowed and Their Order, as well as other procedural precedents. Failing as required in that section to respond to Siladi's special defenses. The superior court ordered on June 30, 2015 that discovery shall proceed. Numerous motions by Siladi for interrogatories and production followed. Deutsche Bank objected to all Siladi's motions and on October 16, 2015 Siladi filed a notice of deposition and request from the court for production. In response Deutsche Bank on January 13, 2016 filed a motion for protection order which was granted by the superior court (trial court) on January 21, 2016. After another effort within the restrictions imposed by the superior court's first protection order, Siladi attempted to pursue discovery (as ordered by a different superior court judge) on June 30, 2015. Deutsche Bank responded March 10, 2016 with a second motion for protection order, and on April 6, 2016 filed a third

motion for protection order which the superior court granted on April 18, 2016. Siladi filed an appeal challenging the superior court granting of several orders which the Connecticut Appellate Court denied on May 2, 2016 which was dismissed by that court on Ju6, 2016.

Petitioner Siladi filed a motion objecting to summary judgment and requesting an evidentiary hearing on November 17, 2017. The superior court scheduled instead a short calendar administrative hearing for December 6, 2017. Siladi filed on November 30, 2016 an objection to summary judgment and detailed memorandum of law. See App. 13 attached. A short calendar administrative hearing

Was held on December 6, 2016 over the oral and written objections of petitioner. On March 27, 2017 the superior court granted Deutsche Bank's motion for summary judgment. Petitioner filed an appeal to the appellate court on April 11, 2017 which was denied on June 8 2017 on a single page order without any written findings of the facts or reason for its decision. In the interim Deutsche Bank filed yet another objection to motion for interrogatories and production on April 26, 2016.

Deutsche Bank filed a motion for strict foreclosure on June 7, 2017 which the superior court granted over the objections of the petitioner at a short calendar administrative hearing on December 18, 2017 and at

the same hearing denied Siladi's motion to dismiss due to Deutsche Bank's unclean hands to proceed with this litigation. Without an evidentiary hearing as required by Connecticut statute and practice. Siladi filed an appeal on January 3, 2018 which the appellate court denied on April 2, 2018 and remanded the case to the superior court. Petitioner filed a petition for certification to appeal to the Connecticut Supreme Court which was denied on a single paragraph page on September 11, 2019. See App. 11.

On September 21, 2021 Deutsche Bank filed a motion to modify judgment after appeal. Petitioner Siladi filed a motion objecting to the motion to modify judgment after appeal on September 29, 2021. The superior court on October 12, 2021 issued a judgment of strict foreclosure over Siladi's oral and written objections. On November 1, 2021 petitioner appealed the strict foreclosure judgment of the superior court. On December 6, 2021 petitioner Siladi filed a motion for articulation to the appellate court as to the superior court's judgment of strict foreclosure. On December 21, 2021 the superior court denied the motion for articulation scribbling denial on the last page of petitioners motion for articulation.

On January 5, 2022 the appellate court granted Deutsche Bank's motion to dismiss appeal and denied petitioner's pending motion as to the superior court's denial of his motion for articulation. Petitioner filed a

motion for stay on June 6, 2022 to the appellate court to file a Writ of Certiorari to the U.S. Supreme Court which the appellate court denied on June 17, 2022.

On February 7, 2023 Deutsche Bank moved to modify judgment after appeal for the sole purpose of setting new law date. Petitioner moved on February 23, 2924 to dismiss the action arguing that Deutsche Bank did not have standing and therefore under Connecticut law and precedent the superior court did not have subject matter jurisdiction, and according to Connecticut practice the superior court was required to hold a trial or an evidentiary hearing to proceed with the case. The superior court scheduled on May 1, 2024 a short calendar judicial hearing not a trial or an evidentiary hearing as required at which a defendant is not entitled to procedural due process rights as guaranteed by the 5<sup>th</sup> and section 1 of the 14th amendment to the U. S. Constitution. Petitioner filed an appeal to the superior court judgment of May 1, 2024 which the appellate court dismissed on June 28, 2024. On July 26, 2024 the appellate court denied petitioner's motion for reconsideration of its June 28, 2023 order. On August 14, 2023 petitioner filed a petition for cert with the Connecticut Supreme Court to appeal from the appellate court's order, the petition was denied on February 15, 2024.

## REASONS FOR GRANTING WRIT

### I. NO TRIAL OR EVIDENTIARY HEARING

The Connecticut Supreme Court's Denial of Siladi's Petition for Certification upholding the Connecticut Superior and Appellate Court's granting of summary judgment and strict foreclosure without the trial court's conducting a trial or evidentiary hearing as requested on numerous occasions at both the trial court (superior court) and appellate court by the petitioner. Where he could, as provided for by the 5<sup>th</sup> and section 1 of the 14<sup>th</sup> amendment to the United States Constitution, assert his due process rights as summarized by Judge Henry Friendly in his treatise "Some Kind of Heading" created a list of due process rights which apply equally to civil due process and criminal due process are:

1. An unbiased tribunal.
2. Notice of a proposed action and the grounds asserted for it.
3. Opportunities to present reasons why the proposed action should not be taken.
4. The right to present evidence including the right to call witnesses.
5. The right to know opposing evidence.

6. The right to cross examine adverse witnesses.
7. A decision based exclusively on the evidence.
8. Opportunity to be represented by counsel.
9. Requirement that the tribunal prepare a record of the evidence.
10. Requirement that the tribunal written findings of the facts and reasons for its decision.

The trial (superior) court in denying Siladi a trial or evidentiary hearing deprived him of the following due process rights guaranteed by the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the United States Constitution as summarized by Judge Friendly above as follows:

1. An unbiased tribunal.
3. Opportunity to present reasons why the proposed action should not be taken.
4. The right to present evidence including the right to call witnesses.
6. The right to cross examine adverse witnesses.
10. Requirement that the tribunal prepare written findings of the facts and reasons for its decision.

The denial by the superior court of Siladi's procedural due process rights defy the intent of the United States Constitution based on the concept of "fundamental fairness". Fundamental fairness. Fundamental due process rights including loss of property that this Court has recognized requiring a high degree of protection from government encroachment Denial of a trial to an individual attempting to protect his home from an entity that did not, actually could not, prove standing is

## **II. PROTECTION ORDERS DENYING PROCEDURAL DUE PROCESS**

Between May 20, 2015 and January 4, 2016 petitioner Siladi attempted to pursue discovery over the persistent objections of Deutsche Bank. The superior court ruled on January 30, 2016 and again on November 2, 2015 that discovery should proceed, Deutsche Bank filed several motions for extension of time to respond and then on October 16, 2015 filed motions objecting to the petitioner's motions for interrogatories and production.

On January 6, 2016 Siladi posted a notice of deposition and request for production. Deutsche Bank responded on January 13, 2017 with a motion for protection order, which the superior court granted on January 2, 2016. App. 12. Deutsche Bank filed a second motion for protection order on March 10, 2016, and Deutsche Bank filed a third on April 18, 2016. See

App. 13. Siladi appealed to the appellate court on May

5, 2016 asserting the protection orders granted by the superior court violated his constitutional rights to due process under the 5<sup>th</sup> and 14<sup>th</sup> amendments to the United States Constitution. The appellate court denied his appeal on a single page one paragraph denial for lack of final judgment.

Deutsche Bank moved forward with its summary judgment motion and a short calendar administrative hearing was held on December 6, 2016. Siladi's objection to motion for summary judgment memorandum of law, App. 10, amongst several other pertinent cases cited a recent (then) Connecticut superior court case in which the court had denied JPMorgan Chase Bank, N.A, ("CHASE") summary judgment because the same document the Purchase and Assumption Agreement dated September 25, 2008 between CHASE and the FDIC which Deutsche Bank alleged in their initial complaint the basis for its right to the Siladi mortgage (property) that CHASE claimed to have purchased and that was a triable issue amongst others not warranting summary judgment. Appendix 13 page 12 *JP Morgan Chase, National Association v Michael Porzio, et al.*, Superior Court Docket No. FST-CV-09-501388 s (October 26, 201from the FDIC 3). Further, petitioner Siladi cited two additional cases in which CHASE had admitted under oath that they had not purchased WAMU mortgages from the FDIC in the Purchasing

and Assumption Agreement but only the servicing rights. See *JP Morgan Chase Bank v. Butler* Superior Court of the State of New York, (july, 2014 County 2013 NY Slip Op 51050 (U) and also *Juan C. Chavez v. JPMorgan Chase Bank, N.A.*, United States District Court for the District of Massachusetts Civil Action No. 12-cv-10691 WGY (July, 2014). See petitioner's objection to motion for summary judgment memorandum of law App. 13.

There is no evidence in the record of this instant case demonstrating that the petitioner Siladi's mortgage was part of the WAMU assets that the FDIC sold JP Morgan Chase Bank, N.A. via the Pooling and Assumption Agreement dated September 25, 2008. The only indisputable evidence as to whether Chase acquired The WAMU mortgages in the purchase of the WAMU assets from the FDIC is Chase's admission in the above cited cases they did not acquire WAMU mortgages but only particular servicing rights. *Nemo dat quod non habet* an entity can't convey what they do not have. Thus the Siladi mortgage and note could not have been conveyed to Chase and subsequently to Deutsche Bank.

### III. NO WRITEN FINDINGS OF FACTS OR REASONING FROM THE CONNECTICUT APPELLATE OR SUPREME COURTS

Petitioner's appeal to the appellate court on May 2, 2016 as to the superior court's order granting Deutsche Bank's motion for protection order was

denied on June 6, 2016 on a single page no written findings of the facts or reasons for the decision to deny petitioner to proceed with discovery as ordered by a earlier decision by the same court. Petitioner appeal on April 11, 2017 to the appellate court as to the superior court's granting of summary judgment was denied on June 13, 2017 with no findings of the facts or reasons for the decision. On November 1, 2022 the petitioner filed an appeal to the appellate court challenging the superior court's judgment of strict foreclosure which the appellate court denied January 5, 2023 again no written facts or reason for the decision.

On Feb 2, 2023 Deutsche Bank moved to modify the judgment. Petitioner on February 23, 2023 moved to dismiss the action as Deutsche Bank didn't have standing and thus the trial court lacked subject matter jurisdiction. On April 10, 2023 petitioner filed a request for an evidentiary hearing to present evidence and testimony with regard to his motion to dismiss. A short calendar administrative remote hearing was held on May 1, 2023. Immediately after the hearing petitioner's motion was dismissed without written findings of facts or reasoning as to the standing of Deutsche Bank and thus the subject matter jurisdiction of the trial court.

Petitioner filed an appeal on May 22, 2023 appealing from the superior court May 1, 2023 order denying his motion to dismiss. Deutsche Bank moved to dismiss the appeal and on June 28, 2023 the appellate court entered an order dismissing the appeal

without any written findings of facts or reasoning. On July 26, 2023 the appellate court denied the petitioner's motion for reconsideration of its June 28, 2023 order. See App. 10. Petitioner on August 14, 2023 filed a petition for certiorari with the Connecticut Supreme Court which was denied on February 15, 2024. See App. 1. That Denial by the Connecticut Supreme Court is the basis for this Petition for Certiorari to this Court.

#### IV. SUMMARY AND CONCLUSION

At the present time in Connecticut judicial system foreclosure litigation defendant's procedural due process rights, guaranteed by the 5<sup>th</sup> and 14<sup>th</sup> Amendments to United States Constitution and the (Connecticut Constitution, Section 10. Article 4) have eroded to the point that foreclosure action defendant's are not entitled to a trial or an evidentiary hearing. At short calendar administrative hearings defendants are not entitled to cross examine adversarial witnesses (usually affiants not in attendance) or schedule expert witnesses on their behalf. Whether the judicial officials are unbiased is questionable, they push through the docket as if it was an assembly line. These courts rarely prepare written findings of the facts submitted by the defendants beyond that the court has seen the plaintiff's copies of the mortgage and note therefore that provided *prima facie* evidence to warrant foreclosure. When defendant Siladi raised the issue of

Deutsche Bank's standing the court's response was Deutsch Bank's possession of the note and mortgage was sufficient to establish standing to pursue foreclosure of petitioner Siladi's home.

When, as is in this instant case, an appeal is taken by a defendant/appellant the appellate court frequently rubber stamps the lower court denying the appeal as lacking a final judgment or as frivolous, regardless of the merits and factual evidence submitted by the appellant/defendant, without written findings of the facts or the reasons for the decision.

Deutsche Bank motioned for three protection orders over a three month period, The superior court (trial) granted two. Both drastically restricting petitioner discovery of Deutsche Bank's standing to initiate and pursue the subject foreclosure action. Plaintiff/respondent also hindered the process by filing several motions objecting to petitioner's motions for interrogatories and production further hindering the discovery process. Deutsche Bank and their attorneys knew that discovery by the petitioner would reveal serious issues as to the alleged assignment of the petitioner/defendant's mortgage to Deutsche Bank from CHASE who had admitted in state and federal districts courts they had never acquired the subject mortgage in the acquisition of WAMU assets from the FDIC in the September 25, 2008 Purchase and Assumption Agreement.. See

Siladi's Memorandum of Law Opposing Plaintiff's Motion for Summary Judgment Appendix 16. In the instant case that could be concerning as the note was discharged over a year before Deutsche Bank initiated the subject foreclosure action. Therefore any attempt to enforce the alleged note would be a violation of 11 U.S.C. Section 524 (a) (1), Effect of Discharge.

It is abundantly clear from the evidence above that petitioner was entitled to pursue discovery unimpeded by the protection orders, issued by the trial court and upheld by the Connecticut appellate and supreme courts, as to the standing of Deutsche Bank to initiate and pursue this foreclosure action. Further, the denial of the trial court to hold a trial or evidentiary hearing as requested by the petition/defendant to determine the facts as to Deutsche Bank's standing to initiate and pursue this foreclosure action.

According to law professor Leviton:

It is important to emphasize what is and what is not in Challenges to foreclosure standing. Foreclosure standing litigation does not directly relate to the issue of whether the home owner is in Default on the mortgage or even indebted and to what amount. The Mortgage title issue does not does not generally go to the question of the generic enforceability of the Validity of the of the mortgage or the generic enforceability. Problems with mortgage titles do not mean that is not outstanding or that it is Not in default. Instead , the mortgage title issue is about the specific Question of who has the right to enforce the mortgage and the Consequences of improper foreclosure. (Leviton, *The Paper Chase: Securitization, Foreclosure, and the Uncertainty of Mortgage Title (2013)* 63 Duke L.J. 650.

For all of the reasons above it is clear there were triable reasons that the petitioner was entitled to a trial or evidentiary hearing as provided for in the due process protections in the 5<sup>th</sup> and section 1 of the 14<sup>th</sup> Amendment.

The Connecticut Supreme Court in denying petitioner's Petition for Certification to Appeal validated the trial court and appellate court's violations of petitioner's constitutional due process rights and reinforcing those lower courts orders nullifying due process rights, in particular of his rights to a trial and the right to pursue discovery in his defense.

#### V. CONCLUSION

For the foregoing reasons, the petitioner Paul Siladi respectfully requests that this Court issue a Writ of Certiorari to review judgment of the Connecticut Supreme Court.

Respectfully submitted,

  
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