Supreme Court, U.S.
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No. 25-1180

In the
Supreme Court of the United States

WADE RYAN REEVES,
Petitioner,

v.

ALISHA MAY GREGORIO
Respondent.

On Petition for Writ of Certiorari to

The Court of Oklahoma Supreme Court

PETITION FOR A WRIT OF CERTIORARI

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DECEMBER 8, 2025 *Petitioner*

QUESTION PRESENTED

1. Did the Supreme Court of Oklahoma violate the Due Process and Equal Protection Clauses of the Fourteenth Amendment by dismissing Mr. Reeves's appeal even though the appellate record had not been filed or completed, and despite receiving notice that sixteen designated items were missing, thereby denying him meaningful review of structural constitutional claims?

2. Did Oklahoma violate the Full Faith and Credit Clause and the Fourteenth Amendment by enforcing only portions of a California judgment, disregarding the governing-law clause and contractual terms contained in the Marital Settlement Agreement, and issuing Oklahoma orders inconsistent with the judgment as written?

3. Did Oklahoma violate the Fourteenth Amendment's requirement of a lawfully constituted tribunal by exercising judicial power without determining its jurisdiction on the record, denying Mr. Reeves any opportunity to present evidence or testimony, and enforcing a foreign judgment through a tribunal that never established lawful authority to act?

PARTIES TO THE PROCEEDING

Petitioner

• Wade Ryan Reeves, Respondent in the District Court of Tulsa County FD-2022-1789 and Appellant in the Supreme Court of Oklahoma, Case No. 122,332 (consolidated with 122,373).

Respondents

• ALISHA MAY GREGORIO (formerly Reeves) Petitioner in the District Court of Tulsa County and Appellee before the Supreme Court of Oklahoma.

LIST OF PROCEEDING

THESE CASES ARISES FROM THE FOREIGN JUDGEMENT REGISTRATION OF THE SAME POST-DISSOLUTION CALIFORNIA PROCEEDING BELOW.

The Supreme Court of Oklahoma, Case No. 122,332 (Con. w/ No. 122,373), order dismissing Petitioner's appeal on September 22, 2025. (**Pet. App. 1a**.)

The Supreme Court of Oklahoma, Case No. 122,332 (consolidated with No. 122,373), order denying rehearing on November 3, 2025.(**Pet. App. 2a**.)

The Supreme Court of Oklahoma, Case No. 122,332 (consolidated with No. 122,373), order on June 10, 2025, declining to compel correction of the appellate record. (**Pet. App. 3a**.)

The District Court of Tulsa County, Case No. FD-2022-1789, order on June 7, 2024, denying Petitioner's jurisdictional challenge. (**Pet. App. 4a–5a**.)

The Oklahoma Court of Civil Appeals, Case No. 120,954, interlocutory opinion affirming registration of the California judgment on October 26, 2023. (**Pet. App. 6a–12a**.) *The opinion is not reported.*

The District Court of Tulsa County, Case No. FD-2022-1789,Order Confirming Registration of Foreign Judgment on October 31, 2022. (**Pet. App. 13a–16a**.)

The District Court of Tulsa County, Case No. FD-2022-1789, Order Confirming Registration of Foreign Judgment (MSA) IN PART on June 11, 2024. (**Pet. App. 17a–19a**.)

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PETITION FOR WRIT OF CERTIORARI

Petitioner Wade Reeves respectfully submits this petition for a writ of certiorari to review the judgment of the Oklahoma Supreme Court.

OPINIONS AND ORDERS BELOW

The order of the Supreme Court of Oklahoma dismissing Petitioner's appeal in **Reeves v. Gregorio**, No. 122,332 (consolidated with No. 122,373), was filed on September 22, 2025, and is reproduced at **Pet. App. 1a.** . The order of the Supreme Court of Oklahoma denying rehearing was filed on November 3, 2025, and is reproduced at **Pet. App. 3a**. No opinion of the Oklahoma Supreme Court is reported. The interlocutory opinion of the Oklahoma Court of Civil Appeals, Case No. 120954, filed on October 26, 2023, is *not reported* and appears at **Pet. App. 6–12**.

JURISDICTION

The Supreme Court of Oklahoma entered its final judgment dismissing Mr. Reeves's appeal on **September 22, 2025**. (**Pet. App. 1a**)
The Supreme Court of Oklahoma denied rehearing on **November 3, 2025**. (**Pet. App. 2a**)

Under Supreme Court Rule 13.1, a petition for a writ of certiorari is timely if filed within 90 days of the denial of rehearing. This petition is timely.

This Court has jurisdiction under **28 U.S.C. § 1257(a)**, which authorizes review of final judgments rendered by a State's highest court where a federal right is denied. The questions presented arise under the **Fourteenth Amendment** and the **Full Faith and Credit Clause** of the United States Constitution.

CONSTITUTIONAL PROVISION INVOLVED

The Fourteenth Amendment to the United States Constitution provides in pertinent part:

"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 the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws."

The Full Faith and Credit Clause, Article IV, Section 1 of the United States Constitution, provides in pertinent part:
"Full Faith and Credit shall be given in each State to the public Acts, Records, and judicial Proceedings of every other State."

Oklahoma Constitution, Article VII, Section 7, provides in pertinent part:

District Courts - Jurisdiction (a) The State shall be divided by the Legislature into judicial districts, each consisting of an entire county or of contiguous counties. There shall be one District Court for each judicial district, which shall have such number of District Judges, Associate District Judges and *"Special Judges as may be prescribed by statute."*

STATEMENT OF THE CASE

This case presents issues of national importance concerning the constitutional limits on state judicial power, the duty of States to follow this Court's mandates, and the full faith and credit owed to judgments free from structural defects. In *Cooper v. Aaron*, 358 U.S. 1 (1958), this Court held that States may not disregard or resist constitutional requirements announced by this Court. In *Glossip v. Oklahoma*, 604 U.S. ___ (2025), this Court reaffirmed that meaningful appellate review cannot rest on omissions in the record that the State itself created or allowed to persist.

Oklahoma disregarded these principles. It exercised judicial power without establishing jurisdiction on the record, selectively enforced only portions of a California judgment while ignoring its controlling contractual terms, denied Mr. Reeves any opportunity to present evidence

or testimony, and ultimately dismissed his appeal based on an incomplete record created by the State. These actions implicate the structural integrity of judicial proceedings and the constitutional obligations that bind all States.

1. Constitutional Background

The Fourteenth Amendment prohibits States from depriving any person of life, liberty, or property without due process of law and guarantees the equal protection of the laws. Due process requires a lawfully constituted tribunal before the State may alter vested rights. See *Nguyen v. United States*, 539 U.S. 69 (2003); *Ryder v. United States*, 515 U.S. 177 (1995); *Williams v. Pennsylvania*, 579 U.S. 1 (2016); *Norton v. Shelby County*, 118 U.S. 425 (1886). A tribunal that exercises judicial authority without first determining its jurisdiction on the record commits structural constitutional error.

The Full Faith and Credit Clause requires each State to enforce the judgments of Sister States **as written**, including all mandatory terms, such as governing-law clauses and incorporated contractual obligations. A State may not enforce only parts of a foreign judgment or substitute its own law for the law specified in the judgment.

This Court's holdings in *Cooper* and *Glossip* confirm that States must follow federal constitutional mandates. Oklahoma's refusal to assemble a complete appellate record, dismissal of the appeal based on a record deficiency of its

own making, and selective enforcement of a foreign judgment conflict with these constitutional requirements.

2. Statutory Background

Registration of a foreign judgment in Oklahoma is governed by the Uniform Enforcement of Foreign Judgments Act ("UEFJA") and the Full Faith and Credit Clause. Such registration is a **civil enforcement action**, not a domestic-relations matter, and must be adjudicated by a judicial officer who has lawfully acquired authority and who first determines jurisdiction on the record.

In Oklahoma, Special Judges are created by statute. Because they derive authority solely from statute, they may exercise judicial power only where jurisdiction is affirmatively established. Mr. Reeves objected to the registration from the outset and later formally challenged jurisdiction. Nevertheless, Oklahoma exercised judicial authority without making any jurisdictional determination.

3. Factual Background and Trial Court Proceedings

From the outset, Mr. Reeves objected to the registration of the purported California "foreign judgment." What was presented to the District Court of Tulsa County was **not** the complete controlling judgment from California. Instead, Oklahoma received only a **single**

subsection of the California orders and **not** the August 14, 2018 Final Judgment of Dissolution and incorporated Marital Settlement Agreement ("MSA"), entered in Stanislaus County Superior Court, Case No. 8005328.

Mr. Reeves repeatedly objected that the filing was incomplete, and he sought an evidentiary hearing to contest registration, present the full California judgment, and offer testimony. He was denied any hearing and thus denied the opportunity to face his accuser, develop a record, or present a complete defense. This initial refusal created a structural due-process violation that infected all later proceedings.

Despite this, the District Court entered an Order Confirming Registration of Foreign Judgment on October 31, 2022 (Pet. App. 13a–16a). Paragraph seven of that order states:

"Respondent's request to present evidence or testimony in support of his objection is denied. The court finds that the four corners of the order allows its registration."

(Pet. App. 14a)

The order contains no statement that arguments were heard.

On March 27, 2024, Mr. Reeves filed a formal jurisdictional challenge supported by the full California judgment and MSA. The MSA expressly states that it "shall be binding as a contract independently of court approval" and that it:

"shall be governed by and interpreted and enforced under the law of the State of California."

Opposing counsel conceded that the terms of the MSA had **not** been modified and remained fully operative.

Nevertheless, on June 7, 2024, the District Court denied the jurisdictional challenge **without determining jurisdiction on the record** and without addressing the controlling California documents (**Pet. App. 4a–5a**). That same month, the court entered a second registration order on June 11, 2024, registering additional provisions only **in part** and still refusing to enforce the MSA as written (**Pet. App. 17a–19a**).

4. Oklahoma Appellate interlocutory Proceeding

After the District Court denied Mr. Reeves any evidentiary hearing and refused to allow him to present evidence or testimony opposing the registration of the purported California judgment, Mr. Reeves filed an interlocutory appeal challenging the registration order. The Oklahoma Court of Civil Appeals ("COCA") issued its decision on October 26, 2023 (**Pet. App. 6a–12a**). The opinion is *not reported.*

In affirming the registration, the Court of Civil Appeals mischaracterized the filing as a "California support order," ignoring that the

judgment also included a $30,000 attorney-fee component and that it derived from a Final Judgment of Dissolution and incorporated Marital Settlement Agreement ("MSA").

On page 9a of its opinion, the Court of Civil Appeals stated:

"The Tulsa County court entered an order confirming registration of the California support order on October 31, 2022. The court notes that the court heard argument from counsel, but it denied father's request to present evidence or testimony in support of his objection. The court found based on its review of the file that the four corners of the California support order allowed its registration." **(Pet. App. 9a)**

However, the actual trial court order from October 31, 2022 tells a different story. In paragraph seven, the order states:

"Respondent's request to present evidence or testimony in support of his objection is denied. The court finds that the four corners of the order allows its registration." **(Pet. App. 14a)**

The trial court did not state that it heard arguments. The appellate court's assertion that arguments were heard is not supported by the record, contradicts the face of the order, and illustrates the very record-distortion problem that this Court condemned in *Glossip v. Oklahoma.*

The appellate court did not address:

- The denial of a hearing
- Whether due process was satisfied
- Whether the Oklahoma court had jurisdiction
- Whether the underlying California judgment was valid
- The governing-law clause requiring enforcement under California law
- The contractual nature of the MSA
- The incomplete registration of the foreign judgment

Instead, the appellate court affirmed solely on the "four corners" rationale applied to an incomplete filing, without reviewing the full controlling documents that Mr. Reeves repeatedly attempted to introduce into the record.

Following the affirmance, the case returned to the District Court. On March 27, 2024, Mr. Reeves filed a formal jurisdictional challenge. Months later, without determining jurisdiction on the record, the District Court denied the challenge (**Pet. App. 4a–5a**) and issued a second order on June 11, 2024 registering additional portions of the MSA **in part** (**Pet. App. 17a–19a**), again without

applying its contractual governing-law clause or its binding effect, and not applying Full Faith and Credit Clause.

5. Oklahoma Supreme Proceeding

Mr. Reeves appealed to the Supreme Court of Oklahoma, asserting that the District Court exercised judicial power without determining jurisdiction on the record, selectively enforced an incomplete foreign judgment contrary to the Full Faith and Credit Clause, and denied him any opportunity to present evidence or testimony.

In preparing the appeal, Mr. Reeves designated sixteen items for inclusion in the appellate record. None were transmitted. Mr. Reeves filed a writ of mandamus seeking to compel completion of the record, as required by due process and this Court's mandate in *Glossip v. Oklahoma*. On June 10, 2025, the Oklahoma Supreme Court declined to compel correction of the record and ordered the appeal to proceed "on the Notice of Completion as filed," despite being notified of the missing items (**Pet. App. 3a**).

On September 22, 2025, the Oklahoma Supreme Court dismissed Mr. Reeves's appeal for failure to file a brief-in-chief (**Pet. App. 1a**), even though the court had refused to require a complete record, making such briefing impossible. Mr. Reeves sought to vacate the

dismissal and requested constitutional review. The court denied rehearing on November 3, 2025 (**Pet. App. 2a**).

These actions directly conflict with this Court's holding in *Glossip*, which prohibits States from relying on omissions in the record that the State itself created or allowed to persist. By dismissing the appeal while knowingly proceeding on an incomplete record, Oklahoma denied Mr. Reeves the meaningful appellate review guaranteed by the Fourteenth Amendment.

REASONS FOR GRANTING THE WRIT

This case presents three important and recurring questions of federal constitutional law. State courts across the country increasingly confront foreign judgments that must be enforced under the Full Faith and Credit Clause while simultaneously ensuring that judicial authority is exercised only by officers who have lawfully acquired jurisdiction. This case asks whether a State may (1) enforce and partially register a foreign judgment without determining its own jurisdiction on the record, (2) dismiss an appeal based on an incomplete record created by the State itself, and (3) disregard material terms of

the foreign judgment, including contractual governing-law provisions. These questions recur nationwide and warrant this Court's review.

First question presents a structural due-process violation: a tribunal may not exercise judicial power without establishing jurisdiction on the record.

This Court has long held that adjudication by a tribunal that lacks lawful authority is a structural defect that renders resulting orders void. *Nguyen v. United States*, 539 U.S. 69 (2003); *Ryder v. United States*, 515 U.S. 177 (1995); *Williams v. Pennsylvania*, 579 U.S. 1 (2016); *Norton v. Shelby County*, 118 U.S. 425 (1886). A court must determine its jurisdiction before exercising judicial power, and orders entered without such authority cannot stand.

Oklahoma exercised judicial power over the registration and enforcement of a California judgment without ever determining its jurisdiction on the record. Mr. Reeves objected to registration from the outset, filed multiple requests for judicial notice of the complete California judgment, and formally challenged jurisdiction on March 27, 2024. The District Court denied the challenge without addressing jurisdiction and without affording the hearing required to satisfy due process (**Pet. App. 4a–5a**).

Despite this unresolved jurisdictional defect, Oklahoma issued two registration orders, the first based on an incomplete filing on October 31, 2022 (**Pet. App. 13a–16a**), and the second registering only part of the MSA on June 11, 2024 (**Pet. App. 17a–19a**) and applied Oklahoma law contrary to the MSA's binding governing-law clause. Because a foreign judgment cannot be enforced by a tribunal that has not lawfully acquired authority, the structural question presented warrants this Court's intervention.

Second question concerns the Fourteenth Amendment's guarantee of meaningful appellate review

This Court has held that a State may not deny access to the record necessary to evaluate constitutional error. *Griffin v. Illinois*, 351 U.S. 12 (1956); *Evitts v. Lucey*, 469 U.S. 387 (1985). Most recently, *Glossip v. Oklahoma*, 604 U.S. ___ (2025), reaffirmed that appellate courts may not rely on evidentiary gaps that the State itself created or allowed to persist. "Appellate review must rest on the actual record, not speculation."

The Oklahoma Supreme Court violated those principles. Mr. Reeves designated sixteen items for inclusion in the appellate record. None were transmitted. The court was formally notified through multiple filings, including a writ of mandamus seeking correction of the record.

Rather than require completion of the record, the Oklahoma Supreme Court ordered the appeal to proceed on the incomplete Notice of Completion and then dismissed the case for failure to file a brief-in-chief (**Pet. App. 1a–3a**).

The State suppressed the record needed for review and then relied on that deficiency to deny relief, precisely the due-process violation *Glossip* prohibits. Whether a State may dismiss an appeal based on a record deficiency of its own making is an important and recurring question that warrants this Court's review.

Third question concerns the Full Faith and Credit Clause and whether a State may selectively enforce a foreign judgment while disregarding binding contractual provisions.

This Court has held that a State must enforce a foreign judgment "as written." *Underwriters Nat'l Assurance Co. v. North Carolina*, 455 U.S. 691, 704–06 (1982). A State may not modify, rewrite, or selectively enforce parts of a sister State's judgment under the guise of registration or local procedure.

Oklahoma did precisely that. The District Court registered only a portion of the California judgment on October 31, 2022, and later registered only some provisions of the MSA on June 11, 2024, without enforcing its governing-law clause and without giving effect to its

binding contractual terms (**Pet. App. 13a–19a**). The Oklahoma Court of Civil Appeals affirmed based solely on the "four corners" of a mislabeled and incomplete filing, mischaracterizing it as a "support order" and ignoring the full California judgment (**Pet. App. 9a, 14a**).

By selectively enforcing only parts of the California judgment and applying Oklahoma law in place of California law, Oklahoma impermissibly fragmented a single judgment into inconsistent interstate obligations. As foreign-judgment enforcement becomes more common, the constitutional limits on such partial enforcement require clarification by this Court.

I. THIS CASE PRESENTS A STRUCTURAL DUE-PROCESS VIOLATION BECAUSE A STATE MAY NOT EXERCISE JUDICIAL POWER WITHOUT A LAWFULLY CONSTITUTED TRIBUNAL.

This case raises an important issue of federal constitutional law. The Due Process Clause requires that liberty and property rights be adjudicated only by a judicial officer who has lawfully acquired authority. *Nguyen v. United States*, 539 U.S. 69 (2003); *Ryder v. United States*, 515 U.S. 177 (1995); *Williams v. Pennsylvania*, 579 U.S. 1 (2016); *Norton v. Shelby County*, 118 U.S. 425 (1886).

Before a court may validly exercise judicial power, jurisdiction must be established on the record. Oklahoma exercised judicial authority over the registration and enforcement of a California judgment without ever determining its jurisdiction, despite Mr. Reeves's objection from the outset and his formal jurisdictional challenge. Under this Court's structural-error precedents, orders issued without a lawfully constituted tribunal are void and cannot be enforced.

A. Due process requires the State to establish its jurisdiction before altering vested rights.

The Due Process Clause prohibits the State from interfering with vested contractual and judgment-based rights without constitutionally adequate procedures. See *Washington v. Glucksberg*, 521 U.S. 702, 720–21 (1997); *Reno v. Flores*, 507 U.S. 292, 301–302 (1993); *Tumey v. Ohio*, 273 U.S. 510, 523 (1927).

Mr. Reeves held vested rights under the California Final Judgment of Dissolution and the incorporated Marital Settlement Agreement, which expressly provides that it is "binding as a contract independently of court approval" and "shall be governed by and interpreted and enforced under the law of the State of California." Oklahoma lacked authority to

modify, reinterpret, or selectively enforce these rights without first establishing its jurisdiction on the record.

Because the Oklahoma District Court never determined jurisdiction before issuing registration orders, due process was violated at the threshold.

B. By removing safeguards against erroneous deprivation, including denying any evidentiary hearing, Oklahoma deprived Mr. Reeves of constitutional due process.

Due process requires structural safeguards to prevent erroneous deprivation of property rights. *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976). Oklahoma provided none.

The District Court denied Mr. Reeves's request to present evidence or testimony opposing registration.

The written order states:

"Respondent's request to present evidence or testimony in support of his objection is denied.
The court finds that the four corners of the order allows its registration." **(Pet. App. 14a)**

No hearing occurred. No evidence was taken. No record was developed.

By eliminating the procedural safeguards necessary to prevent wrongful deprivation, the State violated the Fourteenth Amendment.

C. Oklahoma selectively enforced a foreign judgment while ignoring controlling contractual terms, violating structural due-process protections.

The Marital Settlement Agreement contains explicit governing-law provisions, binding independently of court approval, requiring enforcement under California law. Opposing counsel conceded below that the MSA's terms were not modified and remain fully operative.

Despite this, Oklahoma registered the foreign judgment **only in part**, applied Oklahoma statutes to a California-governed contract, and issued new obligations inconsistent with the judgment's own terms. Arbitrarily enforcing portions of a foreign judgment, while ignoring the contractual and legal framework that gives it force, is incompatible with due process.

D. Oklahoma's exercise of judicial power without ruling on Mr. Reeves's jurisdictional challenge is a structural defect requiring reversal.

Mr. Reeves filed a formal jurisdictional challenge on March 27, 2024. The District Court

denied the challenge without determining jurisdiction on the record.

This Court has long held that a tribunal lacking lawful authority to act is "no court at all." *Norton v. Shelby County*, 118 U.S. at 442. Because Oklahoma exercised judicial power without establishing jurisdiction, the orders at issue are void and cannot stand.

E. Under Cooper v. Aaron, Oklahoma's refusal to follow this Court's constitutional commands confirms the national importance of this issue.

In *Cooper v. Aaron*, 358 U.S. 1 (1958), this Court held that States are bound by the Court's constitutional interpretations and may not refuse to follow them. Oklahoma's refusal to provide a full and complete record, its reliance on speculation, and its dismissal of Mr. Reeves's appeal despite a State-created record deficiency demonstrate open defiance of this Court's mandate in *Glossip v. Oklahoma*, 604 U.S. ___ (2025).

Such recurrences of constitutional violations strengthen the need for this Court to intervene.

II. OKLAHOMA'S SUPPRESSION OF THE RECORD DENIED MR. REEVES MEANINGFUL APPELLATE REVIEW, IN

VIOLATION OF THE FOURTEENTH AMENDMENT.

Meaningful appellate review is an essential component of due process. A State may not deny access to the portions of the record necessary to evaluate constitutional error. *Griffin v. Illinois*, 351 U.S. 12, 18–20 (1956); *Evitts v. Lucey*, 469 U.S. 387, 393–405 (1985); *Brady v. Maryland*, 373 U.S. 83, 87 (1963).

In *Glossip v. Oklahoma*, this Court reaffirmed that appellate courts may not rely on gaps in the record that the State itself created or allowed to persist. Yet the Oklahoma Supreme Court did precisely that.

Mr. Reeves designated sixteen items for inclusion in the appellate record. None were transmitted. His writ of mandamus seeking to compel a complete record was denied. The Oklahoma Supreme Court then dismissed the appeal for failure to file a brief-in-chief—despite the State's own refusal to assemble the record.

A. The Oklahoma Supreme Court could not dismiss an appeal based on omissions the State itself created.

This Court has made clear that due process forbids reliance on evidentiary gaps produced by the State. *Glossip*, 604 U.S. ___; *Brady*, 373 U.S. at 87. Oklahoma's refusal to correct the record, followed by dismissal of the

appeal based on that incomplete record, violated the core promise of meaningful review.

B. The Oklahoma Court of Civil Appeals relied on the incomplete record to speculate in favor of the State.

The appellate court affirmed the registration of a foreign judgment by relying on the "four corners" of an incomplete filing. It mischaracterized the judgment as a "support order," ignored the contractual governing-law clause, and relied on facts not present in the record, such as the assertion that "arguments were heard," which contradicts the trial court's own written order (**Pet. App. 9a, 14a**).

Meaningful review cannot be based on conjecture or invented facts.

III. OKLAHOMA'S SELECTIVE ENFORCEMENT OF A FOREIGN JUDGMENT VIOLATES THE FULL FAITH AND CREDIT CLAUSE.

States must enforce final judgments from sister States **as written**. *Underwriters Nat'l Assurance Co. v. North Carolina*, 455 U.S. 691, 705–06 (1982). Oklahoma may not modify, disregard, or selectively enforce portions of a California judgment.

Oklahoma registered only part of the California judgment on October 31, 2022, ignored the MSA's

binding effect, and later registered additional terms **in part** on June 11, 2024 (**Pet. App. 13a–19a**). It applied Oklahoma law instead of California law, creating inconsistencies and undermining finality.

The Full Faith and Credit Clause prohibits this fragmentation of a single judgment into conflicting interstate obligations.

CONCLUSION

For these reasons, the petition for writ should be granted.

Respectfully submitted,

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December 8, 2025. The Petitioner