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No. 25-1222

IN THE
Supreme Court of the United States

NACHAIYA KAMA,

Petitioner,

v.

GREENRIDGE PLACE APARTMENTS
D/B/A GREENRIDGE PLACE,

Respondent.

On Petition for a Writ of Certiorari to the
Supreme Court of Texas

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

The Supremacy Clause requires that when federal rights are invoked in state court, they be adjudicated rather than displaced by state procedural rules. The *Fourteenth Amendment* further requires that when a State provides appellate review, that review be meaningful. In this case, Petitioner raised federal civil-rights defenses under the Fair Housing Act and 42 U.S.C. § 1982, timely requested findings of fact, and preserved those defenses for appeal. The trial court issued no findings, and the court of appeals affirmed by presuming that the absence of a reporter's record supported the judgment, without identifying how the federal defenses were adjudicated. The question presented implicates the uniform enforcement of federal civil-rights statutes in state courts nationwide.

The questions presented are:

1. Whether the Supremacy Clause permits a state appellate court to affirm a judgment affecting preserved federal statutory defenses by relying on a state procedural presumption where the record contains no findings and no indication that those defenses were adjudicated on the merits.
2. Whether due process guarantees meaningful appellate review when a state court system provides proceedings that produce no reviewable record disclosing how preserved federal civil-rights claims were adjudicated.

PARTIES TO THE PROCEEDING

Petitioner Nachaiya Kama was the defendant in the Justice Court and the appellant in the County Court at Law, Fourteenth Court of Appeals (No. 14-24-00519-CV), and the Supreme Court of Texas (No. 25-0708).

Respondent Greenridge Place Apartments d/b/a Greenridge Place was the plaintiff in the Justice Court and the appellee in the County Court at Law, Fourteenth Court of Appeals (No. 14-24-00519-CV), and the Supreme Court of Texas (No. 25-0708).

RELATED PROCEEDINGS

Greenridge Place Apartments d/b/a Greenridge Place v. Nachaiya Kama, No. 242100147540 (Justice Court, Harris County, Tex. May 8, 2024).

Nachaiya Kama v. Greenridge Place Apartments d/b/a Greenridge Place, No. 1228426 (Harris County Civil Court at Law No. 1, June 27, 2024).

Nachaiya Kama v. Greenridge Place Apartments d/b/a Greenridge Place, No. 14-24-00519-CV (Tex. App. Houston [14th Dist.] June 12, 2025).

Nachaiya Kama v. Greenridge Place Apartments d/b/a Greenridge Place, No. 25-0708, petition for review denied October 17, 2025; motion for rehearing denied December 5, 2025.

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**On Petition for a Writ of Certiorari to the
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PETITION FOR A WRIT OF CERTIORARI

Petitioner Nachaiya Kama, as stated in the above-captioned clause, respectfully prays that a writ of certiorari be issued to review the judgment below.

INTRODUCTION

This petition presents a fundamental question concerning the limits of state procedural autonomy under the Supremacy Clause: May a state appellate court affirm a judgment by procedural presumption where preserved federal civil-rights defenses were raised, findings were timely requested, and the record reveals no indication of how those defenses were adjudicated? The answer determines whether federal civil-rights statutes will be enforced uniformly across state courts or subjected to displacement by local procedural doctrine. Because Congress relies on state courts as primary forums for the enforcement of

federal civil-rights statutes, the integrity of that enforcement framework carries national significance.

The decision below affirmed a judgment of forcible detainer by applying a presumption of correctness to a silent record, despite the trial court's failure to issue requested findings of fact and conclusions of law. The absence of findings is not a mere procedural omission; it is itself a burden on federal rights where it prevents their adjudication. The affirmance did not rest on a disclosed rejection of the federal defenses, but on the absence of a reporter's record. In effect, adjudication of federal law was replaced by presumption.

States retain authority to structure their judicial systems. But under the Supremacy Clause, they may not apply neutral procedural rules in a manner that burdens or nullifies federal rights. *Howlett v. Rose*, 496 U.S. 356 (1990). Here, federal protections under the Fair Housing Act and 42 U.S.C. § 1982 were invoked at trial and preserved for review. Petitioner complied with state procedure by timely requesting findings. None were issued. Rather than remanding for findings sufficient to permit meaningful review, the court of appeals invoked a presumption of regularity and affirmed.

The constitutional concern is structural, not case-specific. When a trial de novo system eliminates the lower-court record and appellate review proceeds without findings or a transcript, the resulting judgment may be insulated from review of whether federal rights were honored or denied. This Court has made clear that when a State provides appellate review, that review must be meaningful in substance, not merely formal. *Evitts v. Lucey*, 469 U.S. 387 (1985). Meaningful review is impossible where the record is silent as to the disposition of federal claims.

The issue extends beyond this dispute. Summary housing proceedings are among the most frequently litigated civil matters nationwide, with millions of eviction cases filed annually, and federal statutory defenses routinely arise in those forums. If appellate courts may affirm by presumption where no findings reveal how federal defenses were adjudicated, the uniform enforcement of federal civil-rights statutes will vary from jurisdiction to jurisdiction, contrary to the Supremacy Clause's command of national consistency.

This case cleanly presents that question. Federal defenses were preserved. Findings were requested but not issued. The appellate court acknowledged their absence and affirmed solely on a presumption, making this an ideal vehicle to address the conflict between state procedural doctrine and federal mandates.

OPINIONS BELOW.

The order of the Supreme Court of Texas denying the petition for review on October 17, 2025, and the order denying rehearing on December 5, 2025, are unreported. Pet. App. 14a, 15a. The memorandum opinion of the Fourteenth Court of Appeals of Texas (Houston) in *Nachaiya Kama v. Greenridge Place Apartments*, No. 14-24-00519-CV (Tex. App. - Houston [14th Dist.] June 12, 2025, no pet.), is unpublished. Pet. App. 1a. The final judgment of the Harris County Civil Court at Law No. 1, Cause No. 1228426, signed June 27, 2024, is unreported. Pet. App. 16a.

JURISDICTION

The Supreme Court of Texas denied the petition for review on October 17, 2025 (Pet. App. 14a) and denied rehearing on December 5, 2025 (Pet. App. 15a). The petition is timely filed within 90 days of the denial of rehearing. This Court has jurisdiction under 28 U.S.C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Constitutional Provisions

The Due Process Clause of the Fourteenth Amendment to the United States Constitution (U.S. Const. amend. XIV, § 1) provides: “*nor shall any State deprive any person of life, liberty, or property, without due process of law.*”

The Supremacy Clause, Article VI, Clause 2 (U.S. Const. art. VI, cl. 2) provides: “*This Constitution, and the Laws of the United States which shall be made in Pursuance thereof ... shall be the supreme Law of the Land.*”

Statutory Provisions

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), 42 U.S.C. § 3604(a), 42 U.S.C. § 3617, and the Civil Rights Act of 1866, 42 U.S.C. § 1982, are implicated in this case. The relevant portions and statutory text are reproduced in Pet. App. H.

STATEMENT OF THE CASE

A. Legal Background

State courts possess concurrent jurisdiction to adjudicate federal civil-rights claims and defenses, including those arising under the Fair Housing Act,

42 U.S.C. §§ 3601–3619, and 42 U.S.C. § 1982. When federal protections are invoked in state court, the Supremacy Clause requires that they be enforced on terms no less effective than in any other forum. State procedural rules may not be applied in a manner that burdens or nullifies federal rights. *Howlett v. Rose*, 496 U.S. 356 (1990); *Felder v. Casey*, 487 U.S. 131 (1988); *Testa v. Katt*, 330 U.S. 386 (1947).

When a State provides appellate review, that review must be meaningful. The record must disclose a basis sufficient to permit evaluation of whether federal rights were honored or denied. The absence of findings is not merely a procedural omission; where federal claims are preserved, it becomes a constitutional barrier to their adjudication. A presumption that substitutes for findings risks displacing federal review with procedural inference, creating the Supremacy Clause concern presented here.

Summary housing-possession proceedings, often termed forcible detainer actions, are designed to be expedited. But procedural efficiency does not alter constitutional structure. When such proceedings intersect with federally conferred civil-rights protections, state procedures must permit adjudication and review consistent with the Fourteenth Amendment (U.S. Const. amend. XIV, § 1) and the Supremacy Clause (U.S. Const. art. VI, cl. 2). This case arises at that intersection.

B. Proceedings in the Justice Court

Greenridge Place Apartments, through its on-site representative Christopher Savoy, initiated a forcible detainer action in Justice Court, Precinct 5, Place 1, Harris County, Texas. A hearing was set for May 8,

2024, after Petitioner requested and paid for a jury trial.

Before the hearing, Petitioner filed a written Motion to Dismiss invoking federal civil-rights protections, including Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), and constitutional guarantees under the Fourteenth Amendment.

On May 8, 2024, Petitioner appeared at the courthouse with a witness and all documentary evidence prepared for presentation. Petitioner reiterated that upon arrival for the scheduled jury hearing, Petitioner and her witness observed Christopher Savoy, the Plaintiff's on-site representative and Plaintiff's (Respondent) counsel, Breton Rycroft, leaving the justice court building. Petitioner was denied entry to the courtroom and prevented from presenting her case. An improper default judgment for possession was entered on the stated grounds of nonappearance.

Following the hearing, Petitioner submitted written inquiries seeking clarification as to how judgment could have been entered at approximately 8:02 a.m. if the presiding judge was not yet seated upon Petitioner's arrival.

Petitioner timely perfected an appeal.

C. Trial De Novo in the County Civil Court at Law

The case proceeded to a bench trial in Harris County Civil Court at Law No. 1 on June 24, 2024. Prior to trial, Petitioner had filed a written Answer and Motion to Dismiss asserting federal statutory defenses under Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), 42 U.S.C. § 1982, and related constitutional protections, thereby squarely

presenting federal questions for adjudication. These federal defenses were preserved for appellate review as a matter of law.

At trial, Petitioner presented testimony and documentary evidence, including rent-payment records, registry receipts, lease provisions, written communications, and evidence reflecting acceptance of rent after notice, improper notice, retaliatory eviction, and discriminatory treatment. Petitioner further raised due-process concerns arising from the justice-court proceedings and the manner in which the forcible detainer was prosecuted.

The county court entered a final judgment on June 27, 2024, awarding possession of the premises, delinquent rent, attorney's fees, costs, and disbursement of registry funds to the Respondent. Petitioner timely filed a Notice of Appeal and, pursuant to Texas Rule of Civil Procedure 296, timely requested Findings of Fact and Conclusions of Law.¹ None were issued.

Because no findings were entered, the record contains no statement of the factual or legal grounds upon which the trial court rejected Petitioner's federal statutory defenses. The absence of findings prevented any determination of how those defenses were resolved and left no reviewable basis reflecting their adjudication.

D. Appeal to the Fourteenth Court of Appeals

Petitioner timely appealed to the Fourteenth Court of Appeals. In petitioner challenged the sufficiency of the evidence, the failure to issue

¹ Finding of Facts at Trial.

requested Findings of Fact and Conclusions of Law, and the adjudication of her preserved federal defenses under the Fair Housing Act and 42 U.S.C. § 1982. The court of appeals affirmed in a memorandum opinion.

The court acknowledged that Petitioner had requested findings of fact and that none were issued. (Pet. App. 4a). It further recognized that no reporter's record existed of the county-court bench trial. Rather than remanding for findings or addressing the federal defenses on the merits, the court applied a presumption that, in the absence of a reporter's record, all necessary facts supported the judgment.

The appellate court did not hold that Petitioner waived, forfeited, or inadequately pleaded her federal defenses. Nor did it conclude that those defenses failed as a matter of law. Instead, the judgment was affirmed solely by operation of procedural presumption.

In practical effect, the presumption substituted for adjudication. The court did not identify factual findings resolving the federal claims, nor did it evaluate whether the record demonstrated compliance with federal statutory protections. The presumption thus functioned not merely to fill an evidentiary gap, but to sustain a judgment without any articulated basis reflecting how the preserved federal defenses were addressed.

Petitioner timely sought panel rehearing and en banc consideration, both of which were denied. The court of appeals rendered judgment on June 12, 2025. The procedural posture leaves no unresolved factual disputes and no alternative grounds for affirmance: federal defenses were raised and preserved, findings were requested and not issued, and the appellate court affirmed solely by presumption. The question

presented is therefore cleanly framed and squarely dispositive.

E. Proceedings in the Supreme Court of Texas

Petitioner timely filed a Petition for Review in the Supreme Court of Texas, seeking review of the court of appeals' affirmance by presumption and its failure to require adjudication of preserved federal civil-rights defenses.

The petition presented a conflict with this Court's precedent concerning the presumptive harm arising from a trial court's failure to issue requested findings of fact and conclusions of law. It further argued that the combined absence of findings and reliance on appellate presumption foreclosed meaningful review of federal claims under the Fair Housing Act and 42 U.S.C. § 1982.

On October 17, 2025, the Supreme Court of Texas denied review. Petitioner timely sought rehearing, again emphasizing that affirmance by procedural presumption, without findings and without merits adjudication, effectively displaced preserved federal statutory defenses. Rehearing was denied on December 5, 2025.

At no stage of the proceedings did any court hold that Petitioner's federal defenses were waived, forfeited, or inadequately pleaded. Nor did any court issue findings or reasoning addressing those defenses on the merits. Instead, each level of review relied on procedural presumption in lieu of adjudication.

The resulting final state-court judgment leaves preserved federal civil-rights defenses unaddressed, presenting a clean and purely legal Supremacy Clause question appropriate for this Court's review.

F. Posture of the Case

The procedural sequence below produced a structural void. The appeal from the Justice Court triggered a trial de novo, extinguishing the prior record. The County Court entered final judgment without issuing the requested findings of fact or conclusions of law. No reporter's record was filed. The court of appeals then affirmed by presuming the absent record supported the judgment.

The combined operation of de novo review, the absence of findings, and appellate presumption did more than leave an incomplete transcript; it eliminated any articulated adjudication of Petitioner's preserved federal defenses under the Fair Housing Act and 42 U.S.C. § 1982. No court rejected those defenses on waiver, forfeiture, or pleading grounds. No court addressed them on the merits. Presumption operated in place of adjudication.

This sequence creates a structural barrier to federal-rights enforcement. Once the de novo proceeding displaced the justice-court record and the trial court issued no findings, appellate presumption insulated the judgment from scrutiny, producing a record silent as to federal law.

That silence is constitutionally impermissible under the Supremacy Clause and the Fourteenth Amendment. When federal rights are invoked and preserved in state court, they must be adjudicated, not rendered effectively unreviewable through procedural design.

Because the federal defenses were properly raised and never resolved on any independent state ground, this case presents a clean and purely legal Supremacy Clause question. The posture makes it an ideal vehicle for clarifying whether state procedural architecture

may displace meaningful adjudication of preserved federal civil-rights claims.

REASONS FOR GRANTING THE PETITION

This case presents a structural question at the intersection of the Supremacy Clause and state appellate procedure: whether a State may affirm a judgment affecting preserved federal statutory defenses without disclosing how those defenses were adjudicated, and instead rely on a procedural presumption to sustain the result. The federal defenses were expressly raised and preserved, and were not rejected on waiver, forfeiture, or pleading grounds. Yet the decision below affirmed in the absence of findings, a reviewable record, or any articulated reasoning addressing federal law, allowing presumption to operate in place of adjudication rather than merely to fill an evidentiary gap. No federal court could affirm under such conditions consistent with federal standards of appellate review, which require a record sufficient to evaluate preserved federal claims.

If that structure is permissible, the enforceability of federal civil-rights statutes in state courts will depend not on merits adjudication, but on procedural mechanics. Such a result threatens the uniform enforcement of federal civil-rights statutes nationwide and is incompatible with the constitutional design that entrusts state courts with concurrent responsibility for the faithful and consistent application of federal law. It also conflicts with this Court's instruction that when a State provides appellate review, that review must be meaningful in substance, not merely formal. *Evitts v. Lucey*, 469 U.S. 387 (1985). Because the federal

question is cleanly presented, purely legal, and unencumbered by factual disputes or independent state-law grounds, this case provides an ideal vehicle for review.

I. State Appellate Presumptions May Not Displace Adjudication of Preserved Federal Rights

The Supremacy Clause requires that when federal rights are invoked in state court, they be adjudicated through procedures that permit meaningful review, not sustained by presumptions that substitute for articulated reasoning. *Testa v. Katt*, 330 U.S. 386 (1947). Although States retain authority to structure their judicial systems, they may not apply neutral procedural rules in a manner that burdens or effectively nullifies federal law. *Howlett v. Rose*, 496 U.S. 356 (1990); *Felder v. Casey*, 487 U.S. 131 (1988).

That principle governs appellate review as well as trial proceedings. When a State provides appellate review, that review must be meaningful in substance, not merely formal. *Evitts v. Lucey*, 469 U.S. 387 (1985). Meaningful review requires a record sufficient to evaluate preserved federal claims. See *Mayer v. Chicago*, 404 U.S. 189 (1971); *Griffin v. Illinois*, 351 U.S. 12 (1956). A reviewing court cannot determine whether federal rights were honored or denied where the record contains no findings and no articulated basis for decision.

Here, Petitioner raised defenses under the Fair Housing Act and 42 U.S.C. § 1982 and timely requested findings of fact and conclusions of law. Those defenses were preserved for appellate review as a matter of law. The trial court issued no findings. The

court of appeals acknowledged that absence, yet affirmed by presuming the missing record supported the judgment. The federal defenses were not rejected on the merits or deemed waived; they were insulated from review by operation of a presumption.

Presumptions of regularity serve legitimate administrative purposes when a record is incomplete through ordinary omission. But here the presumption did not merely fill an evidentiary gap; it replaced adjudication entirely. Affirmance rested on silence rather than reasoning, converting review into assumption. The Supremacy Clause does not permit federal statutory protections to depend on such assumption.

The question presented is therefore whether a state appellate presumption may stand in place of a disclosed merits determination of preserved federal claims. Under this Court's Supremacy Clause jurisprudence, it may not. Federal civil-rights protections cannot depend on procedural silence, nor may their enforcement vary from State to State based on local appellate presumptions. When federal defenses are properly raised and preserved, the Constitution requires adjudication, not assumption.

II. Deference Presupposes Disclosed Findings; It Does Not Replace Them

The decision below conflicts with a structural principle embedded in this Court's appellate jurisprudence: deference presupposes articulated findings.

This Court has long held that meaningful review requires a disclosed basis for decision. *United States v. U.S. Gypsum Co.*, 333 U.S. 364 (1948), requires

findings sufficiently definite to permit appellate understanding. *Anderson v. City of Bessemer City*, 470 U.S. 564 (1985), explains that deferential review assumes findings revealing the path of reasoning. And *Jackson v. Virginia*, 443 U.S. 307 (1979), requires examination of record evidence to determine whether a judgment is legally sustainable.

These decisions reflect a structural norm: appellate courts defer to findings that exist; they do not create findings that were never made. When findings are absent, federal courts remand for clarification rather than presume what the trial court might have concluded. Deference follows adjudication; it does not replace it.

The court of appeals nonetheless affirmed despite acknowledging that no findings were issued. Instead of remanding for findings sufficient to evaluate the preserved federal defenses, it presumed that all facts necessary to support the judgment were found. That approach inverts the logic of federal appellate review. Under Texas's presumption rule as applied here, silence becomes a basis for affirmance rather than a ground for remand.

Where federal rights are preserved, such inversion cannot be squared with federal review norms or with the Supremacy Clause. Federal statutory protections require disclosed adjudication, not appellate speculation.

III. The Decision Below Conflicts with Federal Standards of Adjudication Reflected in This Court's Precedents and Applied in the Fifth Circuit

Appellate presumptions serve a limited and practical function. When a record is incomplete

through ordinary omission, reviewing courts may presume that missing portions support the judgment. But such presumptions fill evidentiary gaps; they do not insulate judgments from constitutional scrutiny or replace adjudication altogether.

The court of appeals held that when a party raises an issue on appeal relying on evidence presented to the trial court ... we must presume the trial court had before it and determined all facts necessary in support of the judgment absent any record of what evidence the trial court considered. At the same time, the court acknowledged that although Petitioner timely requested findings of fact, "the record does not reflect that the trial court made any findings of fact or conclusions of law." (Pet. App. 5a.) The presumption thus operated in the face of an undisputed absence of findings.

That absence is not merely procedural; when federal rights are at stake, it is itself a constitutional defect. The failure to issue findings, combined with the absence of a reporter's record, produced a record devoid of any articulated basis for rejecting preserved federal statutory defenses. Rather than remanding for clarification, the court presumed that unseen evidence supported the judgment and affirmed. The presumption became dispositive, substituting assumption for examination.

This Court's precedents reflect the opposite structural principle: appellate adjudication must engage the record and review disclosed findings. In *Pullman-Standard v. Swint*, 456 U.S. 273 (1982), the Court made clear that appellate courts may not make or supply findings the trial court did not enter. In *Jackson v. Virginia*, 443 U.S. 307 (1979), the Court required review of record evidence to determine

whether a judgment is legally sustainable. In *United States v. U.S. Gypsum Co.*, 333 U.S. 364 (1948), the Court emphasized that findings must be sufficiently definite to permit appellate understanding. And in *Anderson v. City of Bessemer City*, 470 U.S. 564 (1985), the Court underscored that deferential review presupposes findings that disclose the trial court's reasoning. Deference operates only where there is something to defer to.

Federal appellate practice within the United States Court of Appeals for the Fifth Circuit reflects this same structural norm. When findings are absent or inadequate, the remedy is remand, not affirmance by presumption. See *Golf City, Inc. v. Wilson Sporting Goods Co.*, 555 F.2d 426 (5th Cir. 1977), (vacating where findings were insufficient); *Century Marine Inc. v. United States*, 153 F.3d 225 (5th Cir. 1998), (requiring findings that provide a definite predicate for review); *Kelly v. Boeing Petroleum Services, Inc.*, 61 F.3d 350 (5th Cir. 1995), (remanding for inadequate findings); *Eni U.S. Operating Co. v. Transocean Offshore Deepwater Drilling, Inc.*, 919 F.3d 931 (5th Cir. 2019), (vacating where findings prevented meaningful review). The Fifth Circuit's consistent practice reflects the federal structural norm: appellate courts review findings; they do not presume them.

The decision below adopts the opposite approach. Rather than remanding for findings necessary to permit review of preserved federal civil-rights defenses, the state appellate court invoked a presumption tied to the absence of a transcript and affirmed. When silence becomes the basis for sustaining a judgment, a rule designed to facilitate review becomes a mechanism for avoiding it. That

inversion conflicts with federal adjudicative standards and, where preserved federal rights are involved, implicates the Supremacy Clause.

IV. A Subsequent Proceeding Does Not Cure the Absence of Reviewable Adjudication

The court of appeals concluded that any defect in the justice-court proceeding was cured by the availability of a trial de novo. That reasoning assumes a later proceeding automatically remedies earlier deficiencies.

This Court's due-process jurisprudence recognizes no such automatic cure. Due process requires not merely the opportunity for adjudication, but adjudication itself at a meaningful time and in a meaningful manner. *Mathews v. Eldridge*, 424 U.S. 319 (1976). A substitute proceeding remedies a defect only if it produces constitutionally adequate findings and review. *Armstrong v. Manzo*, 380 U.S. 545 (1965); *Logan v. Zimmerman Brush Co.*, 455 U.S. 422 (1982).

Here, the trial de novo eliminated the justice-court record but produced no new findings explaining the disposition of preserved federal defenses. The appellate court then affirmed by presumption. The combined effect was not corrective but cumulative: successive proceedings yielded no articulated adjudication of the federal claims. That sequence created a structural void in which federal rights were invoked yet never meaningfully reviewed.

A subsequent hearing cannot cure the absence of disclosed adjudication where preserved federal rights remain unexamined. The Fourteenth Amendment requires more than procedural layering; it requires reviewable decision-making.

V. The Question Presented Implicates the Structural Integrity of State Courts as Forums for Federal Law

The issue presented extends well beyond the forcible detainer proceedings. State courts exercise concurrent jurisdiction over a vast range of federal statutory claims and defenses and, in doing so, serve as constitutionally authorized forums for the enforcement of federal law. The Supremacy Clause presupposes that federal rights adjudicated in those courts will be resolved with sufficient transparency to permit meaningful review. Congress designed federal civil-rights statutes to operate uniformly nationwide, not to fluctuate based on local procedural variation.

The decision below raises a structural concern about that constitutional arrangement. If a state appellate court may affirm a judgment involving preserved federal statutory defenses despite the acknowledged absence of findings and without a record disclosing their disposition, federal law becomes dependent on procedural architecture rather than adjudicative reasoning. State procedural divergence cannot dictate the enforceability of federal rights.

That risk is neither abstract nor confined to this case. Summary civil proceedings, particularly those governed by streamlined procedures or trial de novo systems, are common across jurisdictions, and federal statutory defenses routinely arise in them. If some States require articulated findings sufficient to permit review while others permit affirmance by presumption when the record is silent, the practical protection of federal rights will vary from State to State.

Such variability is precisely what the Supremacy Clause forbids. See *Testa v. Katt*, 330 U.S. 386 (1947); *Howlett v. Rose*, 496 U.S. 356 (1990). Federal statutory protections are national in scope. Their enforcement cannot depend on whether a particular procedural model produces findings adequate for appellate examination.

This case, therefore, concerns more than the correctness of a single judgment. It concerns whether state procedural doctrines may leave preserved federal rights unexamined in the record while insulating the resulting judgment from review. That question bears directly on the institutional role of state courts within the federal system.

Clarification from this Court is warranted to ensure that state appellate presumptions do not erode the transparency necessary for the uniform enforcement of federal civil-rights law nationwide.

VI. This Case Is an Ideal Vehicle

This case presents a clean vehicle for review. The federal question is squarely framed: Petitioner preserved her Fair Housing Act and § 1982 defenses, timely requested findings of fact and conclusions of law, and the court of appeals affirmed despite the acknowledged absence of both findings and a reviewable record. No procedural obstacle obscures the conflict between state appellate presumption and federal adjudicative standards.

The court did not deem the federal defenses waived, forfeited, inadequately pleaded, or inapplicable. The affirmance rested solely on the operation of presumption after preserved federal claims were raised and findings were requested.

There is no adequate and independent state-law ground barring review. Resolution of the federal question would determine the validity of the judgment.

Nor do factual disputes complicate the posture. The relevant procedural facts are undisputed: federal defenses were raised, findings were requested, none were issued, and affirmance followed by presumption. The Court can resolve the question presented without revisiting the underlying merits or resolving contested facts. The issue is purely legal.

This case, therefore, provides a focused and appropriate vehicle for determining whether a state appellate presumption may substitute for adjudication of preserved federal civil-rights claims.

CONCLUSION

For the foregoing reasons, the petition for a writ of certiorari should be granted, and the judgment below reversed.

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