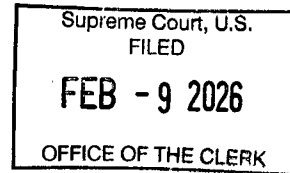


No. 25 -1235



SUPREME COURT OF THE UNITED STATES

Leslie Sanders,

*Petitioner,*

vs.

City of Long Beach,

*Respondent.*

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On Petition for a Writ of Certiorari to  
the Court of Appeal of California, Second Appellate District

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**PETITION FOR A WRIT OF CERTIORARI**

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## QUESTION PRESENTED

Where the Lower Court Judge ruled in error in Leslie Sanders vs. City of Long Beach by not allowing substantial evidence to be entered in court by the plaintiffs that was logged and filed, that could dispute the defendant's knowledge of a dangerous and negligence condition, inconsistent statements from the substantial credible witness, violating our 5th, 6th and 14th Constitutional Amendments under Due Process, the judge ruled the plaintiffs could not use that evidence to impeach the witness for falsities, depriving the plaintiffs from cross examination and confrontation of the individual that provided the defendant's hearsay statements that were not under oath. Judicially Biased by Judge Kim, commenting throughout the proceeding how the defendant was the only one who was truthful, credible, knowledgeable with confident testimony, lastly the blatant departure from established uniformity of U.S. precedent laws and state laws and Federal rule of evidence. Under what circumstances do the plaintiffs have justice and equality under the rule of law after these substantial procedural issues and violations that present an important question of Federal Law and protected rights.

## **PARTIES**

Petitioner/Plaintiff and Appellant is Leslie Sanders.

Defendant and Respondent is the City of Long Beach.

## **LIST OF ALL PROCEEDINGS**

*Leslie Sanders v. City of Long Beach*, No. 19STCV43406 Los Angeles County Superior Court. Judgment entered September 2023.

*Leslie Sanders v. City of Long Beach*, No. B334226 U.S. Court of Appeal for the Second Appellate District, Division Seven. Judgment entered August 18, 2025.

*Leslie Sanders v. City of Long Beach*, No. B334226, U.S. Court of Appeal for the Second Appellate District, Division Seven. Judgment Order entered September 3, 2025 denying Leslie Sanders' Petition for rehearing filed August 29, 2025.

*Leslie Sanders v. City of Long Beach*, No. S293138, Supreme Court of California. En Banc petition for review denied November 19, 2025.

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## **I. Petition for Writ of Certiorari**

Leslie Sanders is a Homeowner in Long Beach whose home, along with other residents' homes as listed in the lawsuit, were damaged in a flood on February 2, 2019 in Long Beach California. Mr. Sanders is representing *Pro Se*, himself and the other plaintiffs. Mr. Sanders and the other residents listed in this lawsuit respectfully petition this court for a writ of certiorari to review the judgement of the Los Angeles court of Appeals Division Seven after a denial without explanation from the California Supreme Court.

## **II. Opinions Below**

In The Court of Appeal of the State of California, Second Appellate District Division Seven's opinion in Case B334226 (Los Angeles County Superior Court No. 19STCV43406) below (Pet. App. A) is not published and was filed on August 18, 2025. In The Court of Appeal of the State of California, Second Appellate District Division Seven's opinion and Order in Case B334226 below (Pet. App. B) is not published and was filed on September 3, 2025. The opinion denying rehearing en banc (Pet. App. C) is also unpublished and filed November 19, 2025, Supreme Court of California Case No. S293138.

## **III. Jurisdiction**

The District Court entered its Judgment on or about September 8, 2023 (dated December 3, 2019 through July 18, 2023). The Appeal by Leslie Sanders was filed on or about November 20, 2023 (dated January 4, 2024-August 18, 2025). The Second Appellate District rendered its opinion

on August 18, 2025, denied Appellant Leslie Sanders' petition for rehearing filed August 29, 2025 on September 3, 2025. The matter was submitted to the California Supreme Court on September 25, 2025, and rehearing en banc by the California Supreme Court was denied on November 19, 2025. It was again submitted by Leslie Sanders to the United States Supreme Court post-marked February 9, 2026 and received by the United States Supreme Court on February 13, 2026.

Mr. Sanders invokes this Court's jurisdiction under 28 U.S.C. 1257, having timely filed this petition for a writ of certiorari within ninety days of the California Supreme Court's Judgement.

#### **IV. Constitutional Provisions Involved**

United States Constitution Amendment, Amendment 5:

Ensures that no one is deprive of life liberty or property without fair legal proceedings. Due process balances the power of the law of the land and protects the individual person from it. It requires the government to follow established procedures (fair trial, presenting evidence, appealing decisions, Impartiality, free from bias etc.) and legal principles before depriving someone of life, liberty or property. When a government harms a person without following the exact course of the law. It constitutes a due process violation, which offends the rule of law. It is a fundamental legal principle that ensures fairness in both civil and criminal matters.

United States Constitutional Amendment, Amendment 14:

The 14 Amendments, the cornerstone of American Civil Rights guaranteeing due process of law and ensuring equal protection of the law for all citizens against state actions, effectively extending the Bill of Rights to States. Prevents the depriving of any person of life, liberty or property without due process of law, protecting Civil Rights. Equal protection of the laws to all person within their jurisdiction.

## United States Constitutional Amendments, Amendment 6:

The right to trial by Impartial Jury: Guarantees that the jury (even cases where the judge is the jury and fact finder) will be unbiased and guarantees the defendants the right to confront the witnesses, Allows the defendants to cross-examine witness against them. The key principles in Civil Trial under the 6 Amendment are the right to challenge evidence, Fair opportunity to be heard, Reliability of testimony (Confrontation Cause), Discovery including depositions The Core principals of confronting witnesses (cross-examination for reliability) and due process from the 6 Amendment heavily influence civil trials through the 14 amendments Due Process Clause ensuring fairness, truth-seeking via testimony (like identifying bias/lies) and the opportunity to challenge evidence, though the 6 amendments only applies explicitly only in criminal cases. Essentially Civil trials adopt these adversarial testing methods (cross examination. Presenting defenses) to achieve reliability making them fundamental to fairness even outside criminal law.

### V. Statement of the Case

The concept of uniformity in Federal courts became a formal precedent with the Rules Enabling Act of 1934, empowering the Supreme Court to create uniform rules, leading to the Federal Rules of Civil procedure taking effect in 1938, ending decades of state-by-state procedural conformity and establishing a national standard for federal Courts. Giving them the ability to resolve splits between courts two or more circuit courts on the U.S. Courts of Appeal when the law is applied differently in different parts of the country and courtroom. Where the lower courts vastly differentiate from the established precedent. And the split from the precedence exhibits contemporaneous growing disagreement that if allow to stand will jeopardize all the previous ruling on Duty of care for a dangerous condition, liability, knowledge of a dangerous conditions and

negligence. In Leslie Sanders vs. The City of Long Beach, the Judge in the trial court ruled the City of Long Beach was not aware of the dangerous condition that led to the damage to our homes from flooding from pump 13 and they did what was reasonable by regular maintenance to prevent flooding and the City was not liable and could not be sued. Government Code 835 establishes public entity can be held liable for injuries from a dangerous condition, that was foreseeable and known. A report ordered in 2005 in which the City, participated in and used in business outlines major problems that needed more than regular maintenance to fix it listed the dangerous conditions, what would cause flooding, a prolong heavy rain event for several days (Causation), it was foreseeable (the Weather report predicted a substantial Heavy rain weather event for seven days) and it provide the City with constructive notice of the problem. The City did not act nor warned the Residents of this danger (the City had 14 years to fix it). The Federal equivalent of Government Code 835 (California Supreme Court case Cameron vs. State (1972) say even a public entity with designed immunity for a property improvement can be it can be held liable for failing to report a dangerous condition, and government liability can be established by showing actual constructive knowledge of an dangerous condition and for an sufficient time allow for protective action Ducey v. Argo Sales (1975). In Tansavatdi v. City of Rancho Palos Verdes (2023) The Supreme Court of California clarified that immunity does not shield public entities from failure to warn residents if the hazard is there and routine maintenance fail to fix, Supreme Court case Bakity v. County of Riverside involved a dangerous condition that had regular maintenance that was ruled in favor of Bakity because regular maintenance did not fix the problem, Government

Code section 835.2 further defines active and constructive notice that the city fail to do. A 2005 report specifically listed pump 13 (as operating below standard and subjected to flood) involves the Federal Tort Claims Act particularly its core principals of not waiving sovereign immunity for negligence. California Tort Claims Act which has similar principals and procedures give you the right to sue a government entity if you follow the torts guide lines (we filed a claim), which we did and we filed our suit for Premises Liability, Public Nuisance, Negligence, Lack of Duty of care for knowledge of a dangerous conditions caused by unsafe condition on city property and failure to warned the residents of this condition. The city failed to carry out a duty of care imposed by law. The California Supreme Court and the U.S Supreme court decisions involving product liability and premises liability have established principals concerning these issues Brown v. George Pepperdine Foundation (1943), Rae v. California Equipment Co (1948), and Kim v. Toyota Motor Corp (2018), where the judges decided the owner has a duty to exercise reasonable care in maintenance and repair and once a report indicate that the equipment has a problem that require more than regular maintenance, it should be done or it is negligence. Once a failure happens the area where the failure happen has to be tested at the same conditions where the failure occurred, this required you to duplicated the same stressful condition and not just turn the equipment on and off under normal conditions with regular maintenance. That Judge Kim in the trial court repeatedly said and the City attorney was in agreement that you could not sued a government entity or city on a common law theory of negligence, the judge was incorrect and the City attorney was incorrect also.

The Lower Courts ruling infringed on the higher Court Authority and highjacked the uniformity of Law. United States Supreme Court Precedent case AT& T Mobility LLC vs. Conception where both the trial court and appeal court agree outside the precedence and the U.S. Supreme Court chastised the lower courts and execute that they were bound to follow the precedence. In Direct TV v. Imburgia (2015) U.S. Supreme Court affirmed the precedence Law and principal of uniformity.

The Judge ruled that the reports and records were entered, that the plaintiff wanted to presented in court were not in the custodianship of the City because they were from an unknown source and produced by a third party but with the City direct impute and were used in business operations, but the court clarified that the reports identifying the City (City of Long Beach's name is on each page of the reports) the City had actual possession, management and control of the records. The city ordered, participated in and used the information from them, this defines the city as custodian of the reports and the record were initially produce by a third party, that the third party will be the initial custodian of the reports, but the receiving entity becomes the custodian of the reports once the records are transferred into their systems and possession and are used. The judges were wrong to not allow this information which gave the City an unfair advantage. Also at issue in Leslie Sanders v. City of Long Beach was the allowance of knowingly false testimony violating Federal rule of evidence 602, Denying knowledge, a witness must have firsthand knowledge, the witness violated Federal rule of evidence 603 by swearing to tell the truth and falsely claiming there were never any problems at pump 13 or litigation, but there was flooding and litigation in Orangewood Village v.

City of Long Beach, Case No. BC083096 [1992/1996] (the City was at fault of Public Nuisance and Damages), claiming ignorance when he had knowledge of the reports, problems and dangerous condition. When this happen, it is perjury. Federal rule of Civil Procedure 11 was violated by the attorney from the city who told the witness about events that did not happen that was established before trial and in trial to be false.

**A. Subornation of Perjury violating Federal Law 18 U.S.C. 1622.**

The depositions that were logged and filed that showed the inconsistencies statement of the defendant witness, and the adverse party depositions that confirm the defendants witness was not truthful the judge said the plaintiff could not use them, but in Morgan v. Davidson (2018) 29 C.A. 5th 540, 556, 240 Cr. 3d. 235 states that PARTIES have the right to present evidence, it is a fundamental right. In People v. Sanchez (California Case) clarified that an expert witness can't just repeat hearsay to the judge or jury as if it is fact and the California Supreme court case Sargon Enterprises, Inc v. University of Southern California reinforced the trial judge role and allow him to exclusion of expert testimony if it is not sufficiently reliable (without supporting documents, or based on speculation. Judge Kim allowed this in court despite our objections and did not allow the plaintiffs to enter into court collaboration evidence to prove the defendant witness was not truthful. Mitchell v. Johnson in California held that excluding an undisclosed witness testimony (a plaintiff's evidence) is a harsh sanction, often inappropriate unless the failure to disclose was willful. Unsubstantiated testimony is hearsay lacks foundation. All these moves by the judge violated our due Process and fair and equal

treatment under the Law, the 5th and 14 amendment and the key elements of the 6th amendments. (The report was entered in the discovery phase but Judge Kim say they were from and unknown source and the City did not have to comply to them because they were done by a third party.)

#### **B. Direct Appeal**

On Direct Appeal Plaintiff Leslie Sanders renewed his argument and preserved his right to appeal the issues. Judge Kim in the trial court exclusion of the plaintiff evidence, insisted that government entity cannot be sued for Negligence (U.S. Supreme Court in Muskopf v. Corning Hospital District (1961) struck down sovereign immunity for Government entity involving known dangerous conditions) the ability to cross-examine the Substantial Credible Witness for inconsistent statement, Judge Kim adamantly said the plaintiffs could not use key evidence to impeach his witness, violating the confrontation clause severely hindering the plaintiffs' Due Process rights and putting in to question the validity of Federal statutes and affirming a ruling that in contrast with state law and putting the state laws in direct conflict with the U.S constitution, Bills of right and Federal Civil procedures, triggering a Federal Review by the highest court when the appeal Court incorrectly ruled in defiance of the existing federal , state and local uniformity of Laws and procedures.

On day one the plaintiff expert witness testified that he had over 40-year credential, State certified experience. He testified that the City did not allow or grant him access to the property, all his information came from the reports, depositions, interrogatories from the City witness Authur Cox and Southern Cal Edison who reports debunked the power outage theory. The

former attorney representing the plaintiff subpoenaed the city for all the records regarding the pumps particularly pump 13 in discovery, the only report that was sent from the City was the 2005 Stormwater Report that listed all the problems with Pump 13 that in its present state would cause heavy flooding in a heavy rain event. The City never sent any other records that was requested by Subpoena for the years after the 2005 Storm water report from 2005-2025 that showed any corrections. (Under Federal Rule 26 of civil procedure, everything, all records, should be available to all parties even if the records are less flattering for the defendants, the plaintiff have a right to them in discovery also the testimony (depositions) of adverse witness who has been dismissed from a lawsuit can be used to impeach, Cal. Evidence Code 780(h) and Code of Evidence 776 allows it and California Evid. Code 1291 and Calif. Code of Civil Procedure 2025.620 allow you to use the deposition of a dismissed party both lower courts judges ruled you can't use them to impeach.) The plaintiff witness confirmed that all the records were from Authur Cox who confirm the records that Pump 13 needed more than regular maintenance and was operating below state standards, operating in a dangerous condition and needed major repairs, that regular maintenance would not be able to fix it. Mr. Cox acknowledge that there were previous flooding, major flooding in 1992, existing dangerous conditions that were not fixed, and problems in 2008, 2012, 2015-2018, yet the next day Mr. Cox testified under oath, that he never had any problems at Pump 13, and never had any flooding. Our expert witness testified that in the Reports (our evidence was denied by the judge who has discretion but withholding substantial evidence that can affect a trial as in People v. Wood Evid. Code 1259 is not absolute and the

evidence can still be reviewed), that Mr. Cox said he was aware of a heavy rain weather event that was going to bring rain to all of Southern California for 8 consecutive days non-stop. Yet the next day Mr. Cox said under oath that he and the City was unaware of a heavy rain event. Our witness testified that the City was unprepared for a heavy rain event, had notice of problems, the dangerous condition was allowed to exist leading to massive flooding as the report detail and they did not warn the public. Public Works, the City and Mr. Cox contributed to, order and use the report in the operation of business to access what the pumps needed. The City hired the third party to produce the report that was in the city possession at the time when the plaintiffs requested it in discovery. The City of Long Beach was the custodian of the report. Yet Judge Kim said they were not because they did not belong to the City (Federal rule of procedure 34), the judge ruling can be challenged. The records were authenticated by Mr. Cox and the plaintiff witness. On the second day of the trial the City substantial Credible witness testified, and Mr. Cox who acknowledge that he had reviewed his depositions, interrogatories and the notes from Southern Cal Edison depositions begin to retract all his previous testimony and what he said in his deposition, interrogatories and all other court documents. These different statement from the deposition and interrogatories impact his credibility and affect the weight and reliability of his testimony. These unexplainable inconsistencies were fatal to Mr. Cox credibility. Judge Kim use Mr. Cox exclusive testimony to determine that Mr. Cox was the only credible and confident witness, none of Mr. Cox testimony was backed up by physical tangible evidence. Federal Rule of Evidence governs how inconsistencies are presented during a trial and under this rule of evident

states any party may attack the witness credibility with evidence, Federal Rule of evidence 613 address the process for impeaching a witness with prior inconsistent statements. The plaintiffs repeatedly opposed Mr. Cox's statements and moved for Mr. Cox to be impeached for inconsistent statement was lawful according to court rules. (Federal rule of evidence 608 requires a witness to be truthful, the second that Mr. Cox started testifying on day two, Mr. Cox's false statement render him non-credible, federal rule of evidence 608(b) allow you challenge credibility by presenting evidence of dishonest conduct, Judge Kim explicitly said we could not use this evidence. A fact-finding judge as Judge Kim proclaim throughout the proceeding did not allow us to properly present our logged and filed evidence from the deposition, exhibits and reports to challenge the falsities of the city and Mr. Cox, this was error. Judge Kim's ruling did not follow the law, this was a procedural error, stymied our argument and deeply favored the defendants, impeding our due process guarantee under the 5th, 6th and 14th amendments for a fair legal proceeding. The City expert witness had no credible physical evidence and replied on unsubstantiated hearsay recollections from another person who was not under oath that the plaintiff never had the opportunity to cross-examine (violating Federal rule 802 on hearsay). Violating our constitutional rights and federal rules for a fair and impartial legal proceeding. Mr. Cox beguiled testimony continues as he dismisses any knowledge of the dangerous conditions (Mr. Cox's truthfulness and the City attorney's truthfulness was questionable, when compared with the depositions, interrogatories and records their recollections undermining their credibility, which is governed by Federal rule 607, 608 and 609 witness credibility. No records and reports since

2005 show any work done to correct the dangerous condition at Pump 13. Mr. Cox. stated in court that the City tested the pump after the flooding and they worked fine the quality test the city conducted several day later in normal condition were not conducted in the same condition that cause the failure, the results are not relevant to the specific failure in question making the inadmissible (The alleged Power failure scenario that was successful disputed by the plaintiffs and Southern Cal Edison). I, Leslie Sanders, convey this to the justices in the appeal court who dismissed my finding and discounted the establish laws. Federal rule of evidence 401 and 402 provide guidelines for the relevancy of quality test. The statement Mr. Cox asserted said about the test after the flooding was based on non-standard tests administered in normal conditions that was presented without proper foundation was confusing and misleading and could not be verify with physical evidence. Testing about specific quality testing procedures often require specialized knowledge making a lay witness inappropriate for proving this type of evidence. To have evidence to be admissible evidence must be authenticated, meaning the proponent must provide evidence sufficient to support a finding that the item is what the proponent claims.

Quality test results without proper substantiation of documentation, adherence to standards, conducted in the same condition at the time of flood violates Federal Rule of evidence 901 (Authenticating and Identifying Evidence). Under Article VII governing opinions and expert testimony, it must comply with Federal rule of evidence 701-705, expert testimony must be based on sufficient facts or data and reliable principals and methods (the Daubert standard). The proponents of any evidence (including test results) you must introduce evidence (physical) sufficient to support a finding that

the item is what the proponent claims it is. You cannot just make unsupported statement like Mr. Cox presented, and have the justices decide that it is supported and valid absent of proof. Mr. Cox altered his statement at the urging of the City attorney. Under Federal rule of Evidence 901, failing to run tests under the correct conditions (under the conditions when the failure occurred) makes the results difficult to authenticate as representative of the actual failure.

## VI. REASONS FOR GRANTING THE WRIT

The 5th amendment was ratified on December 1791 and it is part of and an essential component of the Bill of Rights that establishes legal protections like due process protection against self-incrimination and grand jury rights. Most importantly these prophylactic measures were drafted to ensure equality and equity under the rule of law and fair legal proceeding. In a trial where you have a judge not allowing you to present evidence that can support your substantial claims of negligence and knowledge by the defendants, making biased statements, not being impartial denying the plaintiffs the opportunity to confront a witness (California Case law People v. Green (1980) 27 Cal.3d 1(3) reinforces the broad scope of cross examine to test credibility that includes examining inconsistencies statements) who was proving hearsay testimony, by individuals who were not under oath, going against the federal rules of evidence that can dispute the defendants claims and the same right is extend to the states for individuals seeking justice by guaranteeing equal Protection and due process. The second Part of Judge Kim's ruling was on duty of care and what was reasonable, nothing was done, when a judge acting as a fact finder typically based his

decision on all the evidence presented in court and not on inconsistency statement, decision lacking any evidentiary support (no maintenance reports and excluding our evidence) indicate an abuse of discretion. Note all the evidence that was proven by the plaintiff the judge ruled he was not going to allow it even though it was established in discovery, logged and filed, this judge failed to adhere to the established rules of evidence and procedure, his actions and ruling created a direct conflict with established laws, for these reasons myself and others plaintiff appealed to the next highest court. The defendant's Attorney the City of Long Beach knowingly presented false statements violating Penal Code 995, and in People v. Hjelm 224 Cal. App. 2d 649- Cal Court of appeal, the appeal court ruled against Hjelm for making perjurious statement in court, this case emphasizes the value of when depositions statement is completed and affirmed and statements after they are completed that are different from the original are considered inconsistent. Both California Law and U.S. Law support use of prior inconsistent statement (Rule 801(d)(1) to impeach a witness, Judges are generally obligated to allow this type of impeachment and if a judge were to intervene and stop (which happened in our trial) the impeachment on these grounds that ruling can be challenged, California Evidence Code 780(h) ruling and U.S. Supreme court ruling under federal rule of evidence 613 (Federal rule of civil procedure 32(a) (2)) governed how statements can be used during examination, United States Supreme Court case United States v. Havens (1980) 446 U.S. 620 ruling on use of prior inconsistent statements and United States Supreme case Harris v. New York (1971) 401 U.S. 222, this foundational case established that even statements otherwise inadmissible could be used to impeach the credibility

of a defendant who takes the stand and testifies contrary to those statements. The other reason the Writ of Certiorari should be granted is to preserve the uniformity of law established in established case that the court across the nations and the United states Supreme Court has already ruled on, and the national significance of allowing this ruling by the lower courts of California to stand, if allowed to stand under these circumstances jeopardizes the integrity of the continuity of the precedence affirming law of the land. This current verdict must be revisited and review for clarity, conformity, correctness and uniformity. What the U.S. Supreme Court and the California Supreme Court ruled in previous cases regarding the custodianship of records, how they are used, negligence and duty of care and reasonableness of care, liability, knowledge of a dangerous condition, active and constructive notice of that condition, regular maintenance not being sufficient, in summary what the lower courts rule was not in agreement, and alignment with the current laws and vast amount of cases across the national that are in alignment and agreement with all the ruling from courts across the nation concerning these matters. The Appeal Justice claimed that the plaintiffs did not make any offers of citations to the record or legal authority to support allegations of misconduct. There were numerous references in the depositions and exhibits where the defendants witness stated the City attorney told him what happen that was not accurate. (Our evidence to prove the City and their witness were not being truthful was denied by the judge, violating our due process, but, the judge allowed all the statement from the defendants despite our objections to be heard and he overruled our objections). Both lower courts ruled our depositions, reports and records came from an unknown source, those records and

reports were submitted by the City of Long Beach in discovery, those records were in their possession. The justice erred in their explanation when they excluded the documents that were well within the federal rule of evidence and Calif. statues of evidence that the plaintiffs extensively listed and filed with the court. The decision by the court of appeal is incorrect as it contradicts the law and causes a conflict between state and federal laws and the uniformity of law. (While the lower court can regulate their courts, they cannot create a system with their ruling that effectively block federal law from being enforced, the lower courts can not impede the application of federal laws in state courts. Article VI, section 1, Clause 2 of the constitution it established Federal Law and treaties as supreme laws of the land (Supremacy Clause) ensuring Federal laws priority over state laws, making them the highest laws, binding all judges and state officials. Plaintiffs' argument for uniformity and adherence was disregarded and my appeal was denied as the appeal court agree with the lower court. This case presents this court with the opportunity to clarified the standard of supremacy of law and resolve the conflict between Federal and State laws and preserve the plaintiff constitutional rights to equality and equity under the rule of law with due process and impartially. Deprivation of rights under color of law 18 U.S.C 242 protected Rights and privileges secured by the U.S. Constitution or federal Laws. Our rights were willfully deprived by impartiality, bias and procedural errors and misinterpretation of the law our due process Guarantee by the 5, 6 and 14 amendments.

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**VII. CONCLUSION**

For the foregoing reasons, Mr. Sanders respectfully request that this court issues a Writ of Certiorari to review the judgement of the Court of Appeal Division 7 Los Angeles and the denial from the California Supreme Court.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2026.

Respectfully submitted, :



\_\_\_\_\_  
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