

No. 25-1396

FILED

MAR 30 2026

OFFICE OF THE CLERK
SUPREME COURT, U.S.

In the
Supreme Court of the United States

SARAH HOLMSTROM and ERIC HOLMSTROM,

Petitioners,

v.

ROUDA FEDER TIETJEN & McGUINN,

Respondent.

On Petition for a Writ of Certiorari
To the California Court of Appeal, First Appellate District, Division Four

CORRECTED PETITION FOR A WRIT OF CERTIORARI

SARAH HOLMSTROM
ERIC HOLMSTROM
PRO SE PETITIONERS
100 SE OLYMPIA DRIVE, #104
VANCOUVER, WA 98684
(650) 678-4420
eholmstrom@thing-o.com

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CORRECTED PETITION FOR A WRIT OF CERTIORARI

QUESTIONS PRESENTED

1. Whether a court's exercise of discretion must be accompanied by a sufficiently reasoned explanation to permit meaningful appellate review.
2. Whether the exercise of judicial discretion without an adequate statement of reasons violates the First Amendment and the Due Process and Equal Protection Clauses of the Fifth and Fourteenth Amendments.

LIST OF PARTIES

Petitioners are Sarah Holmstrom and Eric Holmstrom.

Respondent is Rouda Feder Tietjen & McGuinn.

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TABLE OF AUTHORITIES**Cases***(None)***Constitutional Provisions**

U.S. Const. amend. I	i, 1, 4
U.S. Const. amend. V	i, 1
U.S. Const. amend. XIV	i, 2

OPINIONS BELOW

The opinion of the California Court of Appeal, First Appellate District, Division Four, the order denying rehearing, and the order of the Supreme Court of California denying review are reproduced in the Appendix.

JURISDICTION

The judgment of the California Court of Appeal, First Appellate District, Division Four, was entered on September 30, 2025. A petition for rehearing was denied on October 24, 2025. The Supreme Court of California denied review on December 30, 2025. This Court has jurisdiction under 28 U.S.C. § 1257(a).

CONSTITUTIONAL PROVISIONS

The First Amendment provides: 'Congress shall make no law ... abridging the freedom of speech ... or the right ... to petition the Government for a redress of grievances.'

The Fifth Amendment provides: 'No person shall ... be deprived of life, liberty, or property, without due process of law.'

The Fourteenth Amendment provides: 'No State shall ... deprive any person of life, liberty, or property, without due process of law; nor deny any person the equal protection of the laws.'

STATEMENT OF THE CASE

This case arises from a series of dispositive rulings in which the trial court exercised discretion without providing any sufficiently reasoned explanation of the basis or scope of its decisions, and the appellate court affirmed without addressing whether those rulings permit meaningful appellate review.

Petitioners filed this action asserting claims arising from legal representation. The trial court repeatedly sustained demurrers, stating only that it had considered 'all papers submitted,' without articulating its reasoning. The standard and definition of 'papers submitted' and considered, per local rule, lacked transparency to reveal due process harm from apparent consideration versus procedural omission of review and one-party consideration.

The appellate court affirmed, relying on that same formulation, and did not identify any articulated basis from which the grounds of decision could be understood or evaluated.

This case therefore presents a record in which dispositive rulings were issued and affirmed without a clear statement of reasoning, the standards applied, or the

analytical path taken—leaving no basis on which a reviewing court could determine how or why discretion was exercised.

REASONS FOR GRANTING THE PETITION

I. This Case Presents an Important and Recurring Question Concerning the Limits of Unexplained Judicial Discretion

Courts must provide sufficient reasoning to permit appellate review. The decision below departs from that principle by affirming unexplained discretionary rulings.

II. The Decision Below Undermines the Requirement of Meaningful Appellate Review

Absent explanation, appellate courts cannot determine how discretion was exercised, effectively insulating such rulings from review.

III. The Question Presented Has Substantial Constitutional Significance

A. Due Process

Unexplained decisions prevent meaningful challenge and raise due process concerns.

B. Equal Protection

Unarticulated standards invite inconsistent outcomes among similarly situated litigants.

IV. The Lack of Reasoned Decision-Making Threatens First Amendment Interests

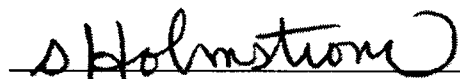
V. This Case Is an Ideal Vehicle for Resolving the Question Presented

VI. Review Is Necessary to Restore Accountability and Uniformity in Judicial Decision-Making

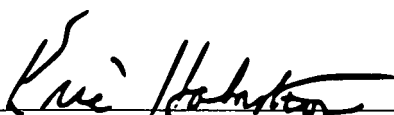
CONCLUSION

The petition for a writ of certiorari should be granted. The relevant opinions and orders are reproduced in the Appendix.

Date: May 26, 2026



Sarah Holmstrom



Eric Holmstrom