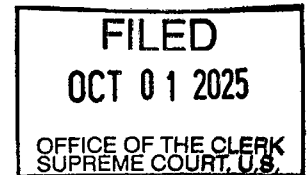


25-6328

ORIGINAL

No. _____

In the
Supreme Court of the United States



TALITHA LACEY COMBS aka Talitha Lacey Randall,

v.

THE HARTFORD INSURANCE, a corporation; URBAN RESTAURANT
GROUP, A Corporation; GORDON HOTEL RESTAURANT, LLC, dba
GORDON TAVERN, A Limited Liability Company; CEO MARK BYRUM, An
Individual, In His Capacity As Officer Of Gordon Hotel Restaurant, LLC;
SHAYLA SWANSON, GENERAL MANAGER, An Individual; JACOB
HENRICHs, LEAD CHEF, An Individual.

*ON PETITION FOR A WRIT OF CERTIORARI
TO THE OREGON SUPREME COURT*

PETITION FOR A WRIT OF CERTIORARI

Talitha L Combs (fka Randall)
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***pro se* Petitioner**

QUESTIONS PRESENTED

(1) When the bias, prejudice, or partiality against a *pro se* Plaintiff is based on either her *pro se* status or her previous whistleblowing activities against the court and the State Judicial System; and that bias, prejudice, or partiality against the *pro se* Plaintiff extends to every level of the State Judicial System and every member of the State judiciary so that a motion for disqualification is unhelpful; and there is no diversity jurisdiction or federal question in the claims, how is the Plaintiff's Constitutional right to an independent and impartial tribunal for any or all future claims made in her home state guaranteed?

(2) If precedent indicates that the motion to dismiss at issue below for insufficiency of service was a sham or frivolous motion based on the rules delineated in precedent; and if the Plaintiff (also the Petitioner here) argued below that the motion to dismiss for insufficiency of service was a sham or frivolous motion, granted only in the particular court's interest of denying (specifically) Plaintiff-Petitioner's Constitutional right to be heard due to its past involvements with her or due to a general disregard of claims from *pro se* litigants; and if counsel for Defendants-Respondents admitted upon conferral that the motion to dismiss for insufficiency of service was a sham or frivolous motion: an argument preserved from below; then *why* did the court err in granting the sham, frivolous motion, in apparent *targeted*, and *intentional* violation of the particular Plaintiff-Petitioner's Constitutional right to the opportunity to be heard by an impartial tribunal under the 5th, 6th and 14th Amendments?

PARTIES TO THE PROCEEDING

Petitioner is Talitha L Combs, fka Talitha L Randall.

Respondents are Urban Restaurant Group, parent corporation; Gordon Hotel Restaurant, LLC, dba Gordon Tavern; CEO Mark Byrum, Officer of Gordon Hotel Restaurant, LLC; Shayla Swanson, General Manager of Gordon Hotel Restaurant, LLC; and Jacob Henrichs, Lead Chef of Gordon Hotel Restaurant, LLC.

Defendant Hartford Insurance is no longer a party to the case.

RELATED PROCEEDINGS

The following proceedings are directly related to this case within the meaning of Rule 14.1(b)(iii):

- *Talitha L Combs v. Hartford Insurance, et al.*, Case No. 23CV23520, Lane County Circuit Court, Judgment entered October 10, 2023.
- *Talitha L Combs v. Hartford Insurance, et al.*, Court of Appeals for the State of Oregon, Appellate Case No. A182807, Judgment entered March 12, 2025 with nonprecedential memorandum of opinion.
- *Talitha L Combs v. Hartford Insurance, et al.*, Oregon Supreme Court, Case No. S071914, Review Denied July 3, 2025.

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INTRODUCTION

This case concerns the near impossibility of getting a fair and impartial hearing or review of any timely, valid, well-pled claims brought in the State where a claimant was the victim of whistleblower retaliation by the State Judicial System itself, and now an indigent, *pro se* litigant.

This case is the first installment of a five-part 'cancel campaign' that clearly demonstrates what happens to a **Christian** woman when she attempts to practice law in the very blue state of Oregon. Petitioner is a graduate of Oregon Law School who passed the Oregon Bar Exam in February 2022, whose license has been withheld under false pretenses of a 'character and fitness evaluation' after her various whistleblowing activities in 2022, including those at the Lane County Circuit Court under the Oregon Judicial Department (OJD).

The instant action is the first filed; three of the other four cases precede it chronologically as for the **facts**. This case was a *first* test case, after being blacklisted in the legal world in Oregon for refusing to stay silent amidst judicial corruption, in order to get hands-on litigation training. The Lane County Circuit Court (OJD) immediately granted a motion to dismiss for insufficiency of service, despite amply sufficient service, as documented below—and despite counsel for Defendants admitting that the motion was frivolous—in apparently reiterating its own whistleblower retaliation against Petitioner, over earlier events of **great** concern to it.

Brief Narrative Of 5 Cases¹

1) **PeaceHealth Case:** Chronologically, my first run-in with the powers-that-be in Oregon (2020), was in demanding an antibiotic from PeaceHealth et al. (a hospital and physicians) for a proven infection over which I threatened litigation for refusal to treat, while attending law school. On threat of litigation, the PeaceHealth doctors immediately labeled me 'crazy' and a "threat" to myself or others for the *sole* purpose of abusing the statutory immunity that attaches to an involuntary hold. They locked me up for 5 days, permanently labeling me 'crazy,' and claiming illegally-obtained and fraudulent immunity. I was retaliated against for due diligence in obtaining healthcare treatment needs. The ensuing civil case filed upon this tortious conduct is Oregon 24CV15165; A185665.

2) **Lane County Circuit Court Case:** In April 2022, after passing the February 2022 Oregon bar exam and securing employment as a Judicial Clerk for Judge Lauren Holland at Lane County Circuit Court in Eugene, Oregon, when temporarily assigned to a *pro tem* judge, I received inappropriate contact from the *pro tem* judge (an older male) via text message to my personal cell phone. On reporting the inappropriate contact, I was asked by the court administrator why I had offered my personal cell phone number to the *pro tem* judge, to which I responded, I was being consistent with Judge Holland's standards and requirements. On learning that Judge Holland had been requiring her law clerks, staff, etc., to use personal cell phones for official court matters, the OJD retaliated against *myself*, lying about me and inventing subordination of every kind. They then terminated me,

¹ *Pro se* Petitioner has opted for first-person voice in relating these matters.

citing several untrue accounts. I was retaliated against for speaking the truth about important, official judicial matters in due diligence. The ensuing civil case filed upon this tortious conduct is 9TH Circuit, 6-24-cv-01016-MC; 25-1319. Due to these events, my license was put on hold by the Oregon State Bar Board of Bar Examiners ("the Board"), pending a 'character and fitness' evaluation.

3) **Salem Health/Marion County Sheriffs Case:** In September, 2022, while working as a law clerk at Lohrke Law, LLC, in Lane County, Oregon, I made several 'FOIA' requests (with approval from my supervisor) to roughly 8 Oregon law enforcement agencies, exposing their illegal practices of withholding public access records. This angered various agents who decided to teach me a lesson, leading to my termination from with no cause given, and my subsequent illegal detention at Salem Health. At the behest of Marion County Sheriffs falsely citing "schizophrenia" (among other things), and falsely fabricating statements from witnesses, Salem Health, acting on officers' words, also illegally abused the statutory immunity that attaches to an involuntary hold. Salem Health or its physicians never examined me prior to detention or forced treatment with psychotropic drugs in violation of the statutory requirements of ORS § 426.228(4), and 42 USC § 1395dd(a). While detained at Salem Health, on openly observing staff doctoring my medical record, I was immediately attacked, thrown down, mounted, and forcibly medicated with psychotropic hallucinogens: tortured. I was clearly retaliated against for exposing, in due diligence and client advocacy, law enforcement agencies' illegal practices. The ensuing civil case filed upon this tortious conduct is Oregon 23CV35702; A185481.

4) **Oregon State Bar Case:** In or around September 2022, the Board explained to me, via my attorney at the time that Troy Wood, Regulatory Counsel for the Board at that time, indicated I would “not likely” be recommended by the Board for licensure, based on my previous interactions with the OJD, for the *religious* or *impertinent* nature of those interactions, neither of which reasons are legitimate grounds for denying licensure. As of the date of the initial filing of this case in October 2025 (one and a half years after my request for hearing was sent in February 2024), the Board ***ignored*** my request for a hearing. After filing a motion for immediate instatement, which was denied, the Board finally scheduled my hearing.

5) **Gordon Hotel Case (Hartford Insurance Case):** Finally, in the instant case, after being fired in the legal world twice for diligence, honesty and integrity, and blacklisted in the Oregon legal world, I took a job as a dishwasher to get by. I was punished for superior performance there as well, injured due to unsafe work conditions which I had repeatedly complained of, and fired when I reported the injury. After noticing the Defendants of my intent to sue, but prior to filing suit, there was an attempt on my life in the form of dangerous tampering with my vehicle. On conferral on a motion to dismiss for insufficiency of service, counsel for Defendants said that he was only filing it because he was too busy to draft an entire answer to the complaint.

Each of these claims brought under the jurisdiction of the OJD, though timely and thoroughly pled, and sufficiently served, were routinely, immediately dismissed in an extreme abuse of discretion by a retaliatory State Judicial System, in violation of Petitioner’s Constitutional

rights under the 5th and 14th Amendments. This is the first case brought and the first to come before You.

OPINIONS BELOW

The order of the Circuit Court for the County of Lane in Oregon is unreported and unavailable for freely accessible viewing, but attached below (Appendix C). The nonprecedential memorandum opinion of the Oregon Court of Appeals is available at 338 Or App 777 and 538 P.3d 607, and attached below (Appendix B). The denial of review from the Oregon Supreme Court is available at 373 Or 815 and 571 P.3d 1103, and attached below (Appendix A).

JURISDICTION

The Oregon Supreme Court issued its denial of review on July 3, 2025. Petitioner timely filed her original, imperfect Petition for writ of certiorari on October 1, 2025. Petitioner timely refiled her amended Petition on December 3, 2025. Jurisdiction is proper in this Court pursuant to 28 U.S.C. § 1257(a).

PERTINENT STATUTES

Oregon Rules of Civil Procedure (ORCP) § 1 states in pertinent part,

B Construction. These rules shall be construed to secure the *just*, speedy, and inexpensive determination of every action. (Emphasis added).

ORCP § 7 states in pertinent part,

D Manner of service.

D(1) Notice required. Summons shall be served, either within or without this state, in any manner reasonably calculated, under all the circumstances, to apprise the defendant of the existence and pendency of the action and to afford a reasonable opportunity to appear and defend. Summons may be served in a manner specified in this rule or by any other rule or statute on the defendant or upon an agent authorized by appointment or law to accept service of summons for the defendant. Service may be made, subject to the restrictions and requirements of this rule, by the following methods: personal service of true copies of the summons and the complaint upon defendant or an agent of defendant authorized to receive process; substituted service by leaving true copies of the summons and the complaint at a person's dwelling house or usual place of abode; office service by leaving true copies of the summons and the complaint with a person who is apparently in charge of an office; service by mail; or service by publication.

The 5th Amendment to the United States Constitution states in pertinent part,

"No person shall . . . be deprived of life, liberty, or property, without due process of law"

The 14th Amendment to the United States Constitution states in pertinent part,

"[N]or 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"

CONSISE STATEMENT OF THE CASE

I. Certiorari is warranted due to the abuse of discretion and presence of extreme bias, prejudice, and partiality against *pro se* Petitioner, in violation of her Constitutional rights, evidenced by the courts' blatant disregard of precedent and facts.

Petitioner's claims were dismissed in total disregard of precedent. **See Appendix F: Petitioner-Plaintiff's Opposition to Defendants' Motion to Dismiss, Filed September 4, 2023.**

Petitioner's claims were dismissed and affirmed in total disregard of the facts provided to the court, such as 20+ attempts of service, with the court only acknowledging 3 attempts. **See Appendix D: Petitioner-Appellant-Plaintiff's Petition for Review to the Oregon Supreme Court, Filed April 15, 2025; in general, entire record below.**

II. The Oregon Supreme Court's denial of review, the Oregon Court of Appeal's Affirmation of dismissal and Opinion, and the Circuit Court's hasty dismissal of the action, given the State Judicial System's existing bias against Petitioner, violate Petitioner's Constitutional rights to be heard by an impartial tribunal under the 5th and 14th Amendments.

Petitioner's valid claims, comprehensively pled, timely brought, and sufficiently served, were dismissed in continuing retaliation for her whistleblowing activities

directed toward the Oregon Judicial Department (OJD), in violation of her Constitutional rights under the 5th and 14th Amendments, as preserved below, when Petitioner became aware of the OJD's ongoing resentment and retaliation campaign, or its general refusal to review cases brought by *pro se* litigants. **See Appendix E: Petitioner-Appellant-Plaintiff's Opposition to Motion to Dismiss the Appellate Brief, Filed February 1, 2024.**

The Oregon Supreme Court denied review of Constitutional questions and questions such as, 'Why did the court ignore precedent?' and 'Is the Oregon Judicial Court System truly accessible to indigent *pro se* litigants?' **See Appendix D: Petitioner-Appellant-Plaintiff's Petition for Review to the Oregon Supreme Court, Filed April 15, 2025; in general, entire record below.**

REASONS FOR GRANTING THE PETITION

- I. Certiorari is warranted due to the abuse of discretion and presence of extreme bias, prejudice, and partiality against *pro se* Petitioner, in violation of her Constitutional rights, evidenced by the courts' blatant disregard of precedent and facts.
 - a. Petitioner's claims were dismissed in total disregard of precedent.

Petitioner's claims were dismissed in total disregard of precedent. **Appendix A-F.** The trial court and Court of Appeals affirmed dismissal for insufficiency of service despite Oregon's two-step framework permitting service that is "reasonably calculated" under ORCP 7 D(1), as recognized in *Davis*

Wright Tremaine, LLP v. Menken, 181 Or App 332, 337 (2002), and *Luyet v. Ehrnfelt*, 118 Or App 635, 639 (1993). **Appendix F — Plaintiff's Objection to MTD, P. 2, L. 1-10; P. 6, L. 1-8; Appendix B — Nonprecedential Opinion, P. 7a-9a.** The courts further disregarded *Lake Oswego Review, Inc. v. Steinkamp*, 298 Or 607, 610-11 (1985), which confirms that the ORCP 7 methods are not exclusive and that other reasonably calculated means may suffice. **Appendix F, P. 3, L. 22-28; P. 4, L. 1-6.** The courts also ignored *Williams v. Jett*, 183 Or App 611, 621 (2002), under which defense counsel's acknowledgment of receipt supports sufficiency—here, the July 28, 2023 email from Defendants' agent Michael B. Gottlieb acknowledging receipt and representation—demonstrating adequate notice and opportunity to appear. **Appendix F, P. 8, L. 22-28; P. 9, L. 1-12.** Additionally, the dismissal overlooked precedent requiring consideration of material prejudice under ORCP 7 G and related cases like *Mullens v. L.Q. Dev., Oregon, Ltd.*, 96 Or App 438 (1989), and *Luyet*, 118 Or App 635, where absence of prejudice counseled against dismissal for technical defects. **Appendix F, P. 9, L. 13-28; P. 10, L. 1-15.** Finally, despite Petitioner's more than 20 points of contact within the 60-day period showing efforts reasonably calculated to apprise Defendants, the appellate decision summarized only three service attempts and affirmed dismissal, further reflecting a disregard of controlling standards and the record. **Appendix D, P. 16a-18a; Appendix B, P. 5a-7a.**

- b. Petitioner's claims were dismissed and affirmed in total disregard of the facts provided to the court.

Petitioner's claims were dismissed and affirmed in total disregard of the facts provided to the court. **Appendix A-F.** The appellate memorandum reduced Petitioner's documented efforts to just three "attempts," despite her record of more than 20 points of contact within the 60-day period, including multiple in-person deliveries, first-class mailings to the registered agent, and extensive email notifications, which she detailed for the trial court and on review. **Appendix B — Nonprecedential Opinion, P. 5a, L. 10–16; P. 6a–7a; Appendix F — Plaintiff's Objection to MTD, P. 4, L. 9–17; P. 5, L. 21–28; P. 7, L. 17–28; P. 8, L. 1–13; Appendix D, P. 16a–18a.** Petitioner specifically described hand delivery of a notice of intent to sue and copies of the complaint at the restaurant, a first-class mailing of the summons and complaint to the registered agent on July 8, 2023, and contemporaneous email notifications to the registered agent and to the property owner's agent that elicited prompt acknowledgement—facts that the affirmance failed to credit as part of the totality of the record. **Appendix F, P. 6, L. 9–28; P. 4, L. 9–17; P. 5, L. 21–28; P. 8, L. 1–13.** The record also showed an email acknowledgment on July 28, 2023, from Defendants' agent Michael B. Gottlieb that defense counsel had been retained and had received the complaint, further confirming that the information Petitioner provided was received, yet the courts nonetheless affirmed dismissal. **Appendix B, P. 6a–7a; Appendix F, P. 9, L. 1–12.** Petitioner additionally demonstrated that Defendants never asserted material prejudice and, in fact, responded within 30 days of the agent's acknowledgment—facts presented below that the affirmance did not reconcile with its outcome. **Appendix F, P. 9, L. 13–28; P. 10, L. 1–15; Appendix B, P. 5a–7a.** Finally, Petitioner showed that dismissal

would materially prejudice her due to indigency and practical barriers to re-service, yet those unrefuted factual showings were effectively ignored in the affirmance. **Appendix F, P. 10, L. 16–28; P. 11, L. 1–15; Appendix D, P. 18a–19a.**

II. The Oregon Supreme Court's denial of review, the Oregon Court of Appeal's Affirmation of dismissal and Opinion, and the Circuit Court's hasty dismissal of the action, given the State Judicial System's existing bias against Petitioner, violate Petitioner's Constitutional right to the opportunity to be heard by an impartial tribunal under the 5th and 14th Amendments.

- a. Petitioner's valid claims, comprehensively pled, timely brought, and sufficiently served, were dismissed either in continuing retaliation for her 2022 whistleblowing activities directed toward the OJD, in violation of her Constitutional rights to a hearing by a fair and impartial tribunal under the 5th and 14th Amendments, as preserved below once Petitioner became aware of the OJD's ongoing resentment and retaliation campaign, or due to its general refusal to review cases brought by *pro se* litigants.

Petitioner's valid claims—comprehensively pled, timely brought, and sufficiently served—were dismissed either in continuing retaliation for her 2022 whistleblowing directed toward the OJD, violating her constitutional rights to be heard by a fair and impartial tribunal under the 5th and 14th Amendments, as preserved below once she became aware of the OJD's ongoing resentment/retaliation, or its general refusal to review *pro se* cases. **Appendix D — Plaintiff-Appellant's Petition**

for Review, P. 23a–25a; P. 16a–19a. The record reflects Petitioner’s multiple, detailed service attempts and acknowledgments—well over 20 points of contact within the 60-day window—contrary to the affirmance’s reduction of her efforts, underscoring that dismissal and affirmance disregarded the factual record and the asserted constitutional violations. **Appendix F — Plaintiff’s Objection to MTD**, P. 4, L. 9–17; P. 5, L. 21–28; P. 7, L. 17–28; P. 8, L. 1–13; P. 9, L. 1–12; **Appendix B — Nonprecedential Opinion**, P. 5a–7a. Petitioner specifically raised the fairness and impartiality concerns tied to her whistleblowing and *pro se* status, as early as they were known to her, leading to this due process argument, though the argument was not preserved from the trial court. **Appendix D**, P. 23a–25a; **Appendix E — Opposition to Motion to Dismiss Appeal**, P. 23a–25a.

- b. The Oregon Supreme Court denied review of Constitutional questions and questions such as, ‘Why did the court ignore precedent?’ and ‘Is the Oregon Judicial Court System truly accessible to indigent *pro se* litigants?’

The Oregon Supreme Court denied review of Constitutional questions and related systemic issues—including why the courts ignored precedent and whether the Oregon Judicial Court System is truly accessible to indigent *pro se* litigants—despite Petitioner’s explicit presentation of those questions in her Petition for Review. **Appendix A — Order Denying Review**, P. 1a; **Appendix D — Plaintiff-Appellant’s Petition for Review**, P. 16a–19a, 23a–25a. Petitioner specifically asked: “Why did the court ignore precedent in *Williams v. Jett...*?”; and “Why did the court ignore precedent requiring an assertion of material prejudice?” as well as whether the

system is accessible to indigent *pro se* litigants, whether courts refused to read the full record, and whether bias against *pro se* litigants affected outcomes. **Appendix D, P. 17a-18a.** The Oregon Supreme Court's order summarily denying review left those Constitutional and access-to-justice questions unresolved. **Appendix A, P. 1a.**

CONCLUSION

Your Honors, this is not a glamorous case. You will not win social points or online credit for hearing it: likely, it will go unnoticed by anyone but God. The Petitioner has no Insta, X, Tik Tok, or Snap following, and she never has had. But she does have the support of Truth, and the never-ending companions of love, joy, peace, patience, kindness, goodness, faithfulness, and self-control. For the reasons above, and in the interest of transparency and true justice, Petitioner begs You to consider taking on her 5-part plea, given the apparent corruption and immovable bias against this *pro se* litigant.

RESPECTFULLY SUBMITTED THIS 3rd day of December, 2025.



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