

No. 25-6671

In The
Supreme Court of the United States

M Norman Hammerlord,

Petitioner,

- v -

Heather Ferbert, San Diego City Attorney,
And Todd Gloria, San Diego City Mayor,

Respondents.

*On Petition for Writ of Certiorari to the
United States Court of Appeals for the Ninth Circuit*

**REPLY TO OPPOSITION TO PETITION FOR
WRIT OF CERTIORARI**

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PETITIONER IN *PRO SE*

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OPENING REPLY TO OPPOSITION

1) On 02 March 2026, the day their response was due, Respondents filed with the Clerk of the Court a request for extension of time. It noted therein that counsel had not received admission to this Court. It was entered on the docket as a motion.

2) On 05 March 2026, Petitioner sent (via priority mail) to the Clerk his Objection to Respondent's untimely request. It noted that Respondent's attorney has not been admitted to practice before this Court and therefore is not authorized to make application before it. Although received by the Clerk on 09 March 2026, it has yet to make it to the docket.

3) On 17 March 2026, the motion was granted without service of the document to Petitioner with 01 April 2026 set as the deadline.

4) On 01 April 2026, Respondents voluntarily filed an Opposition to Petition for Writ of Certiorari in this matter as allowed under Rule 15.1.

5) In accordance with Rule 15.6, Petitioner hereby submits this Reply in response thereto. Primarily, this Reply will show that the Opposition fails to comply with Rule 15.2 which states that in addition to presenting other arguments for denying the petition, the brief in opposition should address any perceived misstatement of fact or law in the petition that bears on what issues properly would be before the Court if certiorari were granted. As a simple reading of their brief will show, it does not contain nor

address any valid misstatement of fact or law nor could it. In fact, their Opposition merely groundlessly contradicts the facts in evidence and makes sophistic statements as though they were facts. Their Opposition does conform to Rule 15.2 and should therefore be disregarded.

6) In addition to the deficiencies noted above, which will be expanded upon herein, it contains other breaches of conduct which should cause the Opposition to be rejected. Petitioner will address those issues in the same order as presented in Respondent's Opposition, as follows:

RESPONDENT'S STATEMENT OF CASE

A. **FACTUAL BACKGROUND** In essence, what Respondent's call factual is in reality a compendium of name calling and mischaracterizations. It introduces matters not in the record and these are irrelevant to the issue at hand. Their pleading flagrantly mentions and reveals the name of the attacker and the SDPD detective who investigated the two (not just one as claimed) assaults on Petitioner. Counsel had no right to enter these names in the record. Now all the attacker has to do is search the internet and find his name associated with this case. He has already promised retaliation for reporting these two crimes to the police and is now given even further reason to carry out his threats.

B. CALIFORNIA COURT PROCEDURAL HISTORY

Respondent's history merely repeats, at least in part, that which has

been spelled out in the petition and offers no new facts or law than has already been submitted.

C. FEDERAL COURT PROCEDURAL HISTORY

Respondent's history merely repeats, at least in part, that which has been spelled out in the petition and offers no new facts or law than has already been submitted.

RESPONDENT'S REASONS FOR DENYING THE PETITION

Here again, Respondent's statements are conclusory, appear to contain nothing more than some boiler plate language and empty accusations. Their "reasons" fails to point to any misstatement of fact or law nor does it present other arguments for denying the petition.

RESPONDENT'S PART A. Again, Respondents rehash statements in the petition and put their spin on certain parts in order to make some portion seem favorable to them. The factual statements in the petition were carefully added so that valid conclusions based on those facts and logic could be drawn. Their Part A fails to point to any misstatement of fact or law nor does it present other arguments for denying the petition. As an example, Petitioner never argued that the Ninth Circuit should have convened *en banc* to change precedent but rather that it was permissive and not mandatory. However, that Court did not so convene but if it had, the result would have been favorable without doubt.

RESPONDENT'S PART B. In this part, Respondents attempt to finally point to some statements in the petition that they erroneously interpret as a misstatement of fact or law. The order that Petitioner was seeking to appeal can be found on page 6 within statement 20 which points to the *quasi* motion to reopen filed on 02 January 2024. Therein, other statements make it clear that the denial order was issued just two days later but was never served on Petitioner. Discovered close to two months later, it was then that the notice of appeal was filed. Subsequent to these actions, the courts reviewed this matter and approved Petitioner's extension for time as outlined in the petition. While Respondents attempt to draw conclusions based on their own perceived facts, they leave out many details which can be found in the petition that prove their theories are baseless.

CONCLUSION

Wherefore, Petitioner asks the Court to find good reason to move forward, and enter findings on the case based on the evidence/facts. Petitioner moves the Court to find favorably in his behalf and award the costs of suit incurred so far in accordance with Rule 43.

Respectfully Submitted,

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M Norman Hammerlord – Petitioner *Pro se*