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March 27, 2026

**Emily Walker**  
c/o: The Office of the Clerk of Court  
Supreme Court of the United States  
1 First Street, N.E.  
Washington, D.C. 20543

**RE: *Frederick Piña v. State Farm Mutual Automobile Insurance Company***  
**Supreme Court of the United States, No. 25-6763**  
**Los Angeles Superior Court, Case No. 24NNCV03841**  
**Conference of April 17, 2026**

Dear Ms. Walker:

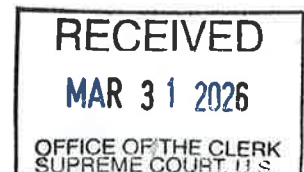
I write as Petitioner, appearing pro se, in the above-captioned matter, which was distributed for the Conference of April 17, 2026, on March 26, 2026. I respectfully submit this letter pursuant to Supreme Court Rule 15.8, as a supplemental filing bringing to the Court's attention intervening matter that was not available at the time of my last filing and that is directly material to the questions presented in the pending Petition for a Writ of Certiorari.

### **I. INTERVENING RULING BY THE LOS ANGELES SUPERIOR COURT**

On today's date, March 27, 2026, the Los Angeles Superior Court, Burbank Courthouse, Department A (Hon. Frank M. Tavelman), issued a Tentative Ruling in Case No. 24NNCV03841, denying Petitioner's *Motion for Judgment on the Pleadings*. The ruling, which becomes the order of the Court if no argument is requested, is significant for several reasons that bear directly on the questions before this Court.

### **II. THE SUPERIOR COURT'S RULING CONFIRMS THE PROCEDURAL POSTURE AT ISSUE**

The Tentative Ruling confirms, as an undisputed fact on the Court's own records, that Defendant State Farm Mutual Automobile Insurance Company **never** filed an answer in this action. The Court's ruling expressly states: **"According to the Court's records, Defendant did not file an answer in this action. This is confirmed by Defendant in its opposition brief."** The Court further acknowledged that **"Defendant's first pleading was a motion to declare Plaintiff a**



**vexatious litigant and, thereafter, documents opposing Plaintiff's motion for reconsideration of the vexatious litigant order."**

This judicial confirmation—from the trial court itself—establishes precisely the factual predicate underlying the Petition for a Writ of Certiorari: that Defendant obtained a **fraudulent** vexatious litigant designation and subsequent dismissal without ever having filed a responsive pleading to Petitioner's Verified Complaint, in violation of **Code of Civil Procedure Section 446** and the California Supreme Court's holding in *Hearst v. Hart*, 128 Cal. 327 (1900), which has never been overruled.

### **III. THE RULING DEMONSTRATES ONGOING DEPRIVATION OF RIGHTS**

Of particular significance, the Superior Court's Tentative Ruling concludes with the following directive: **"No additional hearings will be scheduled for this case as it further perpetuates the vexatious nature of the litigation. Unless ordered by the Court, Defendant State Farm is excused from making appearances for any subsequent dates which may be inadvertently set."**

This directive effectively terminates Petitioner's access to the trial court on a permanent basis—without any hearing on the merits of the underlying claims having ever occurred, and while the foundational question of whether a valid responsive pleading was ever filed remains unaddressed by any court at any level. The threshold issue presented to the Superior Court today—whether State Farm's failure to file any responsive pleading to a verified complaint renders the vexatious litigant order and subsequent dismissal void under **Code of Civil Procedure Section 473(d)**—was denied without substantive analysis, just as it was never addressed in the December 13, 2024 Order.

### **IV. RELEVANCE TO THE PENDING PETITION**

Today's ruling constitutes intervening matter within the meaning of Rule 15.8 because it:

- (a) Provides judicial confirmation, from the trial court's own records and from Defendant's own counsel, that no responsive pleading was ever filed—a factual predicate that was at the core of every argument raised in the Petition;
- (b) Demonstrates that the California courts have now permanently foreclosed all avenues of relief at the trial level, rendering the Petition before this Court the sole remaining judicial remedy;
- (c) Confirms that no state court at any level—the Superior Court, the Court of Appeal (Second Appellate District, Case No. B345286), or the California Supreme Court (which denied review on October 29, 2025)—has ever addressed the dispositive question of whether a defendant who has filed no responsive pleading to a verified complaint may simultaneously obtain a vexatious litigant designation and dismissal of the action; and
- (d) Underscores the due process implications raised in the Petition: Petitioner has been denied any hearing on the merits of claims alleging extrinsic fraud, civil rights violations, intentional infliction of emotional distress, extortion, and perjury—while the party that committed the fraud has never been required to answer those allegations under oath.

## V. REQUEST

I respectfully request that this letter and the attached ruling be brought to the attention of the Court in connection with the Conference of April 17, 2026, for consideration alongside the pending Petition for a Writ of Certiorari, the Motion for Leave to Proceed In Forma Pauperis, and the Appendix previously filed in this matter.

Respectfully submitted,



**FREDERICK PIÑA**, *Petitioner, Pro Se*

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**Enclosure:** Tentative Ruling, Los Angeles Superior Court, Case No. 24NNCV03841, dated March 27, 2026

**cc:** Tod M. Castronovo, Esq.  
Shaver Castronovo LLP  
16255 Ventura Boulevard, Suite 850  
Encino, California 91436  
*Counsel for Respondent*



Frederick Piña &lt;pina.frederick@gmail.com&gt;

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**Frederick Piña v. State Farm Mutual Automobile Insurance Co., No. 25-6763 — Rule 15.8 Supplemental Letter Regarding Intervening Matter**

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Frederick Pina &lt;pina.frederick@gmail.com&gt;

Fri, Mar 27, 2026 at 1:58 PM

To: Tod Castronovo <tmc@sc-law.co>, "Tina M. Bhatia" <tmb@sc-law.co>, Tom Shaver <tws@sc-law.co>, Alexandra Villacorta <agv@sc-law.co>, Esmeralda Marin <reception@sc-law.co>, Michael Troisi <michael.troisi@rivkin.com>, cheryl.korman@rivkin.com, "anthony.hawkins@rivkin.com" <Anthony.Hawkins@rivkin.com>

**CERTIFICATE OF SERVICE**

I, Frederick Piña, acting *pro se*, hereby certify that on this **27th day of March, 2026**, I caused a true and correct copy of the foregoing **Supplemental Letter Pursuant to Rule 15.8** (addressed to Ms. Emily Walker, Office of the Clerk of Court) to be served via electronic mail upon the following counsel of record for the Respondent:

**Counsel for Respondent (State Farm Mutual Automobile Insurance Company):**

- **Tod M. Castronovo, Esq.** | [tmc@sc-law.co](mailto:tmc@sc-law.co)
- **Tina M. Bhatia, Esq.** | [tmb@sc-law.co](mailto:tmb@sc-law.co)
- **Tom Shaver, Esq.** | [tws@sc-law.co](mailto:tws@sc-law.co)
- **Alexandra Villacorta, Esq.** | [agv@sc-law.co](mailto:agv@sc-law.co)
- **Esmeralda Marin (Firm Administration)** | [reception@sc-law.co](mailto:reception@sc-law.co)

**Additional Notified Parties (Rivkin Radler LLP):**

- **Michael Troisi, Esq.** | [michael.troisi@rivkin.com](mailto:michael.troisi@rivkin.com)
- **Cheryl Korman, Esq.** | [cheryl.korman@rivkin.com](mailto:cheryl.korman@rivkin.com)
- **Anthony Hawkins, Esq.** | [Anthony.Hawkins@rivkin.com](mailto:Anthony.Hawkins@rivkin.com)

I further certify that all parties required to be served have been served.

Executed on this 27th day of March, 2026, at Staten Island, New York.

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