26-5424 ORIGINAL

No. ______

Supreme Court, U.S.
FILED
MAY 28 2026
OFFICE OF THE CLERK

IN THE

Supreme Court of the United States

DIEGO RODRIGUEZ,

Petitioner,

v.

ST. LUKE'S HEALTH SYSTEM, LTD., et al.,

Respondents.

ON PETITION FOR A WRIT OF CERTIORARI TO THE SUPREME COURT OF THE STATE OF IDAHO

PETITION FOR A WRIT OF CERTIORARI

Diego Rodriguez
Petitioner Pro Se
1317 Edgewater Dr. #5077
Orlando, FL 32804
freedommanpress@protonmail.com
(208) 891-7728

QUESTIONS PRESENTED

This case arises from a state-court civil judgment in which liability was not adjudicated. The trial court entered a default against petitioner as a discovery sanction, deeming the allegations of the complaint admitted. A jury proceeding limited to damages followed, and a judgment of approximately $51.875 million—of which approximately $25.375 million was punitive—was entered against petitioner jointly and severally with other defendants.

A jury's impartiality is not a courtesy extended to the parties. It is the condition on which the jury's power to decide rests at all. *This case asks what remains of that principle when a juror's bias is admitted, on the record, and the juror is seated anyway*.

The questions presented are:

1. Whether the Fourteenth Amendment permits a civil judgment to stand where jurors who acknowledged bias were seated, when the structural guarantee of an impartial tribunal—as distinct from a party's personal challenge rights—does not depend for its existence on any litigant's timely objection.

2. Whether the Due Process Clause permits a substantial punitive damages award where the liability predicate for that award was established by discovery-sanction default rather than by adjudication, such that the reprehensibility determination central to *BMW of North America, Inc. v. Gore, 517 U.S. 559 (1996),* and *State Farm Mutual Automobile Insurance Co. v. Campbell, 538 U.S. 408 (2003),* rests on a presumption rather than on proof tested by an adversary.

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RULE 29.6 CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 29.6 of the Rules of the Supreme Court of the United States, Petitioner Diego Rodriguez states as follows:

Petitioner is an individual, not a corporate entity. Petitioner has no parent corporation, and no publicly held corporation owns 10% or more of any stock in Petitioner. The disclosure requirements of Rule 29.6 are accordingly inapplicable; this statement is filed to confirm that fact for the Court.

Dated: May 28th, 2026

Respectfully submitted,

Diego Rodriguez

Diego Rodriguez
Petitioner Pro Se
1317 Edgewater Dr. #5077
Orlando, FL 32804
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freedommanpress@protonmail.com

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PARTIES TO THE PROCEEDING

Petitioner Diego Rodriguez was the defendant-appellant below.

Respondents St. Luke's Health System, Ltd.; St. Luke's Regional Medical Center, Ltd.; Chris Roth; Natasha D. Erickson, M.D.; and Tracy W. Jungman, N.P., were the plaintiffs-respondents below.

Additional defendants below, not petitioners here, were Ammon Bundy; Ammon Bundy for Governor; Freedom Man Press, LLC; Freedom Man PAC; and People's Rights Network.

RELATED PROCEEDINGS

St. Luke's Health System, Ltd. v. Rodriguez, No. 51244, Supreme Court of Idaho. Judgment entered February 10, 2026; rehearing denied March 2, 2026.

St. Luke's Health System, Ltd. v. Rodriguez, No. CV01-22-06789, District Court of the Fourth Judicial District, Ada County, Idaho. Default Judgment entered August 29, 2023.

OPINIONS BELOW

The opinion of the Supreme Court of Idaho (App. A) is not yet reported. The order of the Supreme Court of Idaho denying rehearing (App. B) is unreported. The Default Judgment of the District Court of the Fourth Judicial District (App. C) is unreported and is reproduced in full in the Appendix; relevant excerpts of the related Findings of Fact, Conclusions of Law and Order for Permanent Injunctive Relief are also reproduced therein.

JURISDICTION

The Supreme Court of Idaho entered judgment on February 10, 2026, and denied a timely petition for rehearing on March 2, 2026. This Court has jurisdiction under 28 U.S.C. § 1257(a).

CONSTITUTIONAL PROVISION INVOLVED

The Fourteenth Amendment to the United States Constitution provides, in relevant part: *"No State shall ... deprive any person of life, liberty, or property, without due process of law."*

STATEMENT OF THE CASE

A. The Liability Default.

Respondents, a hospital system (St. Luke's Hospital) and several of its personnel, sued petitioner and others in Idaho state court for defamation and related torts. Petitioner represented himself throughout the trial-court proceedings.

Following a series of discovery disputes, the trial court imposed escalating sanctions and, on June 13, 2023, struck petitioner's pleadings and entered a default. By operation of that order, the factual allegations of the operative complaint were deemed admitted. *Liability was therefore not adjudicated on the merits; it was established as a discovery sanction*. Petitioner does not, in this Court, relitigate the propriety of the sanction as a matter of state procedural law. The questions presented concern the federal constitutional consequences that follow when a sanction-based default becomes the predicate for a substantial punitive award.

B. The Damages Proceeding and the Seated Jurors.

After the default, a jury proceeding limited to damages went forward. During jury selection, prospective jurors were questioned about their ability to be impartial. At least two who acknowledged bias were nonetheless seated.

One prospective juror openly stated: *"I do have some bias towards both parties in this case...St. Luke's [the Plaintiff] saved my life in a battle with cancer four years ago and I also have some negative bias towards the defendant."* This juror was seated.

A second prospective juror, asked whether they could set aside what they had read about the case and decide solely on the evidence, stated that *"it would be difficult doing so,"* explaining: *"I have family who work now in the health care industry, so I would be favorable toward their position."* Asked by the court to confirm — *"You feel like you might be bias toward the medical providers?"* — the juror answered: *"In favor of their position, yes."*

A seven-day jury proceeding on damages followed, at which evidence was presented but petitioner was prohibited, pursuant to an order entered by Judge Lynn Norton, from presenting opposing evidence or argument. The order expressly stated: *"This court will not consider opposing argument or evidence from Diego Rodriguez during default damages hearing."* (App. D.) Jurors therefore never had the opportunity to hear petitioner's responses, arguments, or evidence before determining compensatory and punitive damages. The jury returned a verdict, and on August 29, 2023, the trial court entered a Default Judgment awarding damages, jointly and severally against petitioner and the other defendants, in the following amounts: approximately $26.5 million in compensatory damages and approximately $25.375 million in punitive damages, for a total of approximately $51.875 million, together with statutory interest and previously awarded fees.

C. The Decision of the Supreme Court of Idaho.

The Supreme Court of Idaho affirmed. As to the sanction and default, it relied principally upon *Hammond Packing Co. v. Arkansas, 212 U.S. 322 (1909),* and *Insurance Corp. of Ireland v. Compagnie des Bauxites de Guinee, 456 U.S. 694 (1982),* concluding that petitioner's discovery noncompliance justified case-terminating sanctions. As to petitioner's jury-related arguments, the court held them unpreserved under Idaho Rule of Civil Procedure 47 because no challenge for cause was raised during voir dire. The court did not separately address whether the Due Process Clause imposes independent constitutional limits upon the imposition of massive punitive damages by a jury that included members who expressly acknowledged bias or predisposition concerning the parties, particularly where liability had already been established through sanction-based default rather than adjudication on the merits.

REASONS FOR GRANTING THE PETITION

This petition does not ask this Court to reweigh evidence or to revisit the state courts' findings of fact. It asks two questions of constitutional principle. The first concerns the most basic precondition of a lawful jury verdict—***impartiality***. The second concerns the limits the Constitution places on punishment. Each question matters beyond this case, and each warrants this Court's review.

I. An Admitted-Bias Juror Cannot Lawfully Sit, And No Procedural Rule Can Cure What Such a Juror's Presence Destroys.

"A fair trial in a fair tribunal is a basic requirement of due process." In *re Murchison, 349 U.S. 133, 136 (1955).* The jury is the tribunal. Its authority to decide — to take property, to impose punishment — is legitimate only because it is impartial. Impartiality is not an amenity the law extends to litigants diligent enough to demand it. It is the condition on which the jury's power to decide exists at all.

This case tests that principle in its starkest form. Here, impartiality was not merely doubtful; it was disclaimed. Two jurors told the court, in their own words, that they were biased. One acknowledged *"negative bias towards the defendant,"* and also explained that the plaintiff hospital had saved their life. Another, asked directly whether they were biased toward the medical providers, answered: *"In favor of their position, yes."* Both were seated. The voir dire record further reflected that multiple prospective jurors either worked for St. Luke's (the Plaintiff) or had spouses employed by St. Luke's, underscoring the institutional proximity between the jury pool and the plaintiff hospital system. After petitioner sought identification of the jurors ultimately selected from a pool that included multiple individuals employed by St. Luke's or married to St. Luke's employees, Judge Nancy Baskin denied the request and directed petitioner to instead obtain a transcript or audio recording of the proceedings. The resulting materials identified jurors only by number, leaving petitioner unable to determine whether any prospective jurors with employment or spousal ties to St. Luke's were ultimately seated. (App. E.) *Ultimately, the jury that fixed a multi-million-dollar judgment against petitioner included members who had said, on the record and before being chosen, that they could not approach the case impartially.*

When bias is admitted, the usual justification for a forfeiture rule disappears. Ordinarily, a requirement that a party challenge a juror during voir dire serves a real function: it forces latent bias to be surfaced and tested while it can still be addressed. But there was nothing latent here. There was no hidden fact a timely challenge would have brought to light, no credibility determination for the trial court to make, no question of degree left for adversarial testing. The bias was already in the record, in the jurors' own words. A rule designed to discover bias has no work to do where bias has been confessed.

That is why the decision below cannot be sustained on the ground it chose. The Supreme Court of Idaho treated petitioner's objection as forfeited under Idaho Rule of Civil Procedure 47 because it was not raised during voir dire. But a forfeiture rule of that kind governs a party's personal right to challenge a juror. It cannot govern the separate and structural question whether the tribunal was lawfully impartial in the first place. Some constitutional defects are not curable by waiver, because they are not personal to the litigant — they go to the integrity of the proceeding itself. A jury that knowingly includes confessedly biased members is such a defect. The seating of those jurors did not injure only petitioner's procedural rights; it compromised the lawfulness of the tribunal that rendered the verdict.

A system faithful to its own first principle must, in this circumstance, be self-correcting. *Where a juror has admitted bias, that juror must not sit — whether or not any party objects — because impartiality is the court's obligation, not merely the litigant's burden to police*. To hold otherwise is to say that a known-partial jury may render a binding verdict so long as the disfavored party was not diligent enough, or not present enough, to object. That proposition cannot be reconciled with *Murchison*. It converts impartiality from a precondition of judicial power into a privilege forfeited by procedural default. This Court should grant review to make clear that impartiality is the former — and that no rule of timing can render lawful a verdict returned by a tribunal that was, by the jurors' own admission, not impartial.

II. Constitutional Limits on Punishment Do Not Switch Off When Liability Is Established by Sanction.

This Court has held that the Due Process Clause imposes substantive limits on punitive damages, and that reprehensibility is *"[t]he most important indicium of the reasonableness of a punitive damages award." Gore, 517 U.S. at 575; see State Farm, 538 U.S. at 419*. This Court has also held that punitive damages carry procedural due process protections against arbitrary imposition. *Philip Morris USA v. Williams, 549 U.S. 346, 353–54 (2007)*. These protections share a premise: that the facts on which punishment rests have been established through a reliable process.

Here they were not. Liability was fixed by a discovery sanction—by deeming a complaint's allegations admitted. The reprehensibility that *Gore* and *State Farm* make the centerpiece of constitutional review was thus supplied, at its foundation, by a presumption.

The sanction order did not merely establish liability by default. It further provided that: *"This court will not consider opposing argument or evidence from Diego Rodriguez during default damages hearing."* (App. D). The punitive proceeding that followed therefore involved not simply a presumption against petitioner, but a damages determination conducted under an order expressly foreclosing opposing evidence and adversarial participation by the defendant himself. This Court has not addressed the constitutional implications of imposing extraordinary punitive punishment under such a procedural structure.

This Court has not decided whether, or how, the *Gore* and *State Farm* framework applies when the liability predicate for a punitive award is a sanction. That gap should be closed. A discovery sanction may, under *Hammond Packing Co. v. Arkansas*, 212 U.S. 322 (1909), justify a presumption as to the merits of a defense. But *Hammond Packing* addressed liability, not the magnitude of punishment, and it was decided nearly nine decades before *Gore* recognized that the Constitution itself limits punitive awards. To read *Hammond Packing* as authorizing a sanction to supply the reprehensibility predicate for a multi-million-dollar punitive judgment is to extend a liability rule into a domain it never addressed—and to allow a procedural sanction to displace a substantive constitutional limit. Petitioner submits that *Hammond Packing* should not be read so broadly, and that where it would collide with the constitutional ceiling on punishment, the constitutional ceiling must prevail. This Court's review is warranted to say so.

III. The Questions Are Important, Recurring, and Worthy of This Court's Judgment.

Neither question is confined to this case. Discovery-sanction defaults are entered in civil courts across the country, and punitive damages are sought in cases of every kind. Juror bias—and disputes over what must be done about it—arises wherever juries are empaneled. The intersection of these ordinary features of litigation with the constitutional guarantees of an impartial tribunal and of limited punishment is not a marginal concern. It is a recurring one, and lower courts decide it without guidance from this Court.

Petitioner does not represent that the lower courts have divided in a manner squarely and expressly acknowledged. His submission is that the questions are open and consequential, and that this Court's *Murchison*, *Gore*, and *State Farm* lines have not been reconciled with the sanction-and-forfeiture rules the decision below applied.

Finally, the stakes are not abstract. A judgment of roughly $51.875 million, of which roughly $25.375 million is punishment, *now stands against an individual who litigated without counsel, was tried by a jury that included members who had acknowledged bias, never had liability adjudicated at all, and faced proceedings of extraordinary procedural and financial complexity while litigating without counsel under circumstances that made meaningful legal defense nearly impossible.* **Whatever one thinks of the parties or their dispute, a constitutional order that permits such a judgment to stand has, somewhere, lost hold of a first principle**. This Court alone can restore it. The petition should be granted.

CONCLUSION

For the foregoing reasons, the petition for a writ of certiorari should be granted.

Respectfully submitted,

Diego Rodriguez

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CERTIFICATE OF COMPLIANCE

As required by Rule 33.2 of the Rules of the Supreme Court of the United States, I certify that the foregoing Petition for a Writ of Certiorari complies with the page and length limitations of that Rule.

The petition is prepared on 8½ by 11 inch paper, with text double-spaced (except for indented quotations, footnotes, and headings, which are single-spaced), in standard 12-point typeface. The petition does not exceed 40 pages, exclusive of the questions presented, the list of parties, the table of contents, the table of authorities, any verbatim quotation of constitutional provisions or statutes, and the appendix.

The total number of pages of the petition proper (i.e., excluding the items identified above) is 10 pages.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: May 28th, 2026

Diego Rodriguez

Diego Rodriguez
Petitioner Pro Se