

No. _____

**IN THE
SUPREME COURT OF THE UNITED STATES**

JAIME ROBALINO

Applicant,

v.

U.S. BANK NATIONAL ASSOCIATION, TRUSTEE, ET AL

Respondent.

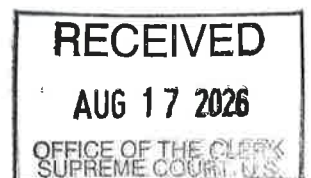
On Petition for Writ of Certiorari to the
Supreme Court of Connecticut

**UPDATED EMERGENCY APPLICATION FOR STAY OF
STATE COURT PROCEEDINGS AND LAW DAY
PENDING DISPOSITION OF PETITION FOR WRIT OF CERTIORARI**

**SUPREME COURT RULE 23; 28 U.S.C. §§ 1257 AND 1651(a)
UPDATED TO REFLECT STATE-COURT RELIEF SOUGHT AFTER THE COURT'S
AUGUST 5, 2026 RETURN**

URGENT — CONNECTICUT LAW DAY: AUGUST 18, 2026

Jaime Robalino
Applicant, Pro Se
41 Tally Ho Ln
Stamford, CT 06905
203-832-5171
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August 13, 2026



**TO THE HONORABLE SONIA SOTOMAYOR, ASSOCIATE JUSTICE OF THE
SUPREME COURT OF THE UNITED STATES AND CIRCUIT JUSTICE FOR THE
SECOND CIRCUIT:**

Applicant Jaime Robalino respectfully submits this UPDATED EMERGENCY APPLICATION FOR STAY OF STATE COURT PROCEEDINGS AND LAW DAY pursuant to Supreme Court Rule 23 and the All Writs Act, 28 U.S.C. § 1651(a). This updated application is submitted after the Court returned Applicant's August 3, 2026 Emergency Application on August 5, 2026, with the direction that the same relief first be sought from the Connecticut Supreme Court or that Applicant explain why such relief is not possible.

Applicant has now taken the requested additional step. On August 11, 2026, Applicant filed an Emergency Motion for Review and Emergency Application for Stay of Proceedings and Law Day in the Connecticut Appellate Court, Docket No. AC 47828, pursuant to Connecticut Practice Book §§ 61-14 and 66-6. The Connecticut Appellate Court denied that emergency motion on August 11, 2026. The order is expressly docketed under AC 47828 and is captioned "Order on Motion for Stay (P.B. § 61-14)." The order contains no substantive explanation for the denial.

The Connecticut Supreme Court proceeding, Petition No. SC 250303, is closed following denial of certification on March 24, 2026. Applicant was advised by the Connecticut Appellate Court's case-management personnel that a new stay motion could not be filed in the closed Connecticut Supreme Court petition proceeding and that the stay request had to be presented in the disposed appellate matter, AC 47828. Applicant complied with that instruction and obtained the August 11, 2026 denial now attached as a new Appendix item.

Accordingly, Applicant has now sought the requested stay from the state appellate court identified as the proper forum and has received a denial. Applicant respectfully renews the request for emergency relief from this Court because the August 18, 2026 Law Day is imminent and the state court has not stayed the proceedings.

I. THE UPDATED PROCEDURAL POSTURE

Applicant commenced and pursued a foreclosure appeal through the Connecticut appellate system in *U.S. Bank National Association, Trustee v. Jaime Robalino, et al.*, Appellate Court Docket No. AC 47828.

Applicant thereafter sought certification in the Connecticut Supreme Court, Petition No. SC 250303. Certification was denied on March 24, 2026.

Applicant timely filed a Petition for Writ of Certiorari in this Court on June 22, 2026. The prior August 3, 2026 Emergency Application represented that the petition was pending and sought a stay of the August 18, 2026 Connecticut Law Day. The prior application and its Appendix identified the three earlier Superior Court stay/open-judgment rulings.

On August 5, 2026, after receiving Applicant's August 3 Emergency Application, this Court returned the application with the requirement that the same relief first be sought from the Connecticut Supreme Court or that Applicant explain why such relief was not possible.

Applicant thereafter sought state appellate relief in AC 47828 on August 11, 2026, pursuant to Practice Book §§ 61-14 and 66-6.

The Connecticut Appellate Court denied that motion on August 11, 2026. The order identifies AC 47828, the Superior Court docket, the motion date of August 11, 2026, and the disposition "Denied."

Applicant now returns to this Court promptly and in compliance with the Court's August 5 instruction.

II. WHY RELIEF WAS SOUGHT IN THE CONNECTICUT APPELLATE COURT RATHER THAN IN THE CLOSED CONNECTICUT SUPREME COURT PETITION

The procedural history is important because Applicant did not disregard the Court's instruction. He followed it to the extent permitted by Connecticut appellate procedure.

The Connecticut Supreme Court petition, SC 250303, was a petition for certification and was denied on March 24, 2026. That proceeding is now closed. Applicant was advised by the Connecticut Appellate Court's case manager that a new stay motion could not be filed as a new motion in the closed Supreme Court petition proceeding and instead had to be filed in the disposed appellate case, AC 47828.

That instruction is consistent with Connecticut's appellate procedural framework. Connecticut Practice Book § 66-6 provides for a motion for review of an order made by the trial court concerning a stay of execution in a case on appeal. The Connecticut Judicial Branch's current Motion for Review guidance expressly identifies § 66-6 as the governing provision for such review.

Practice Book § 61-14 likewise addresses review of orders concerning stays and when a stay may be requested from the court having appellate jurisdiction. The Connecticut Judicial Branch's foreclosure postjudgment guidance identifies § 61-14 as the rule governing review of stay orders.

Applicant therefore filed in AC 47828—the appellate matter in which the stay-review mechanism was available—and not in the closed SC 250303 certification proceeding. The August 11 order confirms that the Appellate Court accepted and acted upon the filing under

Practice Book § 61-14.

II. APPLICANT HAS NOW SATISFIED THE COURT'S REQUIREMENT TO SEEK THE SAME RELIEF BELOW

The principal procedural defect identified by the Court on August 5 has now been cured.

Applicant has made the requested state-court application, in the forum designated by Connecticut appellate procedure, and that application has been denied.

This is not a case in which Applicant simply bypassed the state courts. Before returning here, Applicant sought stays in the Superior Court on multiple occasions, sought to open the judgment and extend the Law Day, and then sought emergency appellate review in AC 47828. The prior August 3 application documented the two Superior Court stay denials and the denial of the motion to open and extend the Law Day.

On August 11, 2026, Applicant filed the Emergency Motion for Review and Emergency Application for Stay in AC 47828. The Appellate Court denied it the same day. The order is included as Appendix 4 to this updated application.

Applicant has therefore done what Supreme Court Rule 23.3 requires: he sought the requested relief in the appropriate state court and, after that relief was denied, has returned to this Court with a particularized explanation of the state procedural posture.

IV. JURISDICTION AND AUTHORITY TO GRANT THE REQUESTED STAY

Applicant's Petition for Writ of Certiorari seeks review of the judgment of the Supreme Court of Connecticut, the highest state court in which review could be had. The prior application identified 28 U.S.C. § 1257 as the jurisdictional basis and Supreme Court Rule 23 as the procedural basis for emergency stay relief.

Supreme Court Rule 23 governs applications for stays. Rule 23.3 specifically requires an applicant to explain why the requested relief is unavailable from another court and, except in extraordinary circumstances, requires that the relief first be sought below. Applicant has now supplied precisely that information and has actually sought the relief below.

The All Writs Act, 28 U.S.C. § 1651(a), authorizes this Court to issue writs necessary or appropriate in aid of its jurisdiction. Applicant seeks a temporary stay to preserve the practical ability of this Court to adjudicate the pending petition before the Connecticut foreclosure Law Day extinguishes the property interest that is the subject of the petition.

The Supreme Court's current rules are effective March 16, 2026.

V. THE AUGUST 11, 2026 CONNECTICUT APPELLATE COURT DENIAL LEAVES NO STATE-COURT STAY IN PLACE

The August 11 order is critical new evidence. It shows that Applicant did not merely assert that state relief was unavailable; he affirmatively sought it. The Appellate Court's order records that the motion was filed August 11, 2026 by Jaime Robalino and that the order was entered August 11, 2026 with the disposition "Denied."

The order does not state that a stay was granted, does not extend the Law Day, and does not otherwise preserve the status quo. Thus, the August 18, 2026 Law Day remains imminent.

The electronic notice states "Sent By: Supreme/Appellate," but the substantive order is expressly identified as an Order on Motion for Stay under Practice Book § 61-14, docketed under AC 47828. Applicant therefore respectfully treats the August 11 ruling as the Connecticut Appellate Court's disposition of the stay motion filed in the proper appellate case.

VI. THE EMERGENCY IS NOW EVEN MORE IMMEDIATE

The Connecticut Superior Court's Law Day is scheduled for August 18, 2026. Only seven days remain from the date of this updated application.

The original August 3 application explained that, under Connecticut strict foreclosure procedure, the Law Day presents a final and time-sensitive event affecting Applicant's property interest. It explained that the purpose of the requested stay was to preserve the status quo while the pending certiorari petition could be considered.

The urgency has increased, not diminished. Applicant has now followed the Court's August 5 direction and obtained the state appellate ruling. Yet no stay exists, and the Law Day remains set for August 18.

Without immediate relief, the state proceeding may reach the point of no practical return before this Court has an opportunity to consider the pending petition.

VII. REASONS A STAY SHOULD ISSUE

A. IRREPARABLE HARM

Applicant faces irreparable harm because the August 18 Law Day threatens to extinguish the property interest that is the subject of the pending petition before this Court can determine whether to grant certiorari. The prior application explained the consequences of Connecticut's strict foreclosure process and the resulting risk that later federal review could become practically ineffective.

B. PRESERVATION OF THIS COURT'S JURISDICTION

A temporary stay would preserve this Court's ability to grant meaningful relief if certiorari is granted. The requested relief is limited and does not ask this Court to decide the merits of the petition at this stage.

C. FAIR PROSPECT OF REVIEW

The pending Petition for Writ of Certiorari presents the federal questions identified in the prior application, including due-process concerns arising from the foreclosure proceedings and questions concerning jurisdiction, standing, the authority of the purported trustee, the chain of assignment, and constitutionally adequate notice. The prior application set forth those questions in detail.

Applicant respectfully maintains those arguments for purposes of the present stay application without asking this Court to prejudge the petition.

D. BALANCE OF EQUITIES

The requested stay preserves the status quo for the limited period necessary for this Court to consider the pending petition. The harm to Applicant from allowing the Law Day to occur may be permanent, while the harm to Respondent from a temporary stay is delay in enforcement of its judgment. The prior application explained this balance in detail.

E. PUBLIC INTEREST

The public interest favors orderly judicial review before a state foreclosure process permanently changes the parties' property rights. A stay permits this Court to decide whether further review is warranted without the state proceeding rendering that review practically meaningless.

VIII. WHY THE RELIEF WAS NOT AVAILABLE FROM THE CONNECTICUT SUPREME COURT AS A NEW MOTION

Applicant respectfully provides the Court with the specific explanation requested on August 5.

The Connecticut Supreme Court petition, SC 250303, was denied on March 24, 2026 and is closed.

Applicant was advised by the Connecticut Appellate Court's case manager that a new stay motion could not be filed in the closed Connecticut Supreme Court petition proceeding.

Applicant was instructed that the stay request had to be filed in the disposed Connecticut Appellate Court case, AC 47828.

Applicant followed that instruction and filed the Emergency Motion for Review and Emergency Application for Stay in AC 47828 on August 11, 2026.

The Connecticut Appellate Court denied that motion on August 11, 2026.

The August 11 order is attached as Appendix 4 and establishes that the requested relief was actually sought from the Connecticut state appellate court before Applicant returned to this Court.

Accordingly, Applicant respectfully submits that the purpose of Rule 23.3 has been fully satisfied. There is no remaining practical state-court stay application available in the closed SC 250303 petition, and the proper appellate stay mechanism in AC 47828 has already been invoked and denied.

IX. THE REQUEST IS NARROWLY TAILORED

Applicant requests an immediate temporary stay of the Connecticut Superior Court proceedings, including the August 18, 2026 Law Day, pending disposition of the Petition for Writ of Certiorari, or at minimum pending this Court's determination of the present emergency

application.

Applicant does not ask this Court to decide the merits of the foreclosure case, to reopen the Connecticut appeal, or to determine the merits of the Petition for Writ of Certiorari in this emergency application.

The requested relief is solely to preserve the status quo and prevent the August 18 Law Day from producing irreversible consequences before this Court can exercise its certiorari jurisdiction.

X. REQUEST FOR IMMEDIATE ADMINISTRATIVE STAY AND EXPEDITED CONSIDERATION

Because the Law Day is scheduled for August 18, 2026, Applicant respectfully requests an immediate administrative stay while the Circuit Justice or the Court considers this application. Applicant further requests expedited consideration because ordinary consideration after August 18 would not adequately protect the property interest at issue.

Applicant has complied with the Court's August 5 instruction and respectfully requests that the Court now consider the merits of the stay request.

XI. RELIEF REQUESTED

Applicant Jaime Robalino respectfully requests that the Circuit Justice, or this Court:

Immediately enter an administrative stay of the August 18, 2026 Law Day and all further proceedings in Connecticut Superior Court, Judicial District of Stamford/Norwalk, Docket No. FST-CV20-6045824-S, that would enforce, implement, execute, or otherwise carry out the judgment;

Grant this Updated Emergency Application for Stay of State Court Proceedings and Law Day;

Stay the August 18, 2026 Law Day pending disposition of Applicant's Petition for Writ of Certiorari, or, at minimum, pending further order of this Court;

Preserve the status quo so that the pending petition can be considered without the underlying property interest being extinguished before this Court can act; and

Grant such other and further relief as the Court deems just and proper.

XII. CONCLUSION

Applicant has now complied with the precise procedural requirement identified when the Supreme Court returned the August 3 emergency application on August 5, 2026. Applicant sought the requested stay in the Connecticut appellate forum identified by Connecticut procedure and by the Appellate Court's case-management instruction. The Appellate Court denied the motion on August 11, 2026. The order is now before this Court as a new Appendix item.

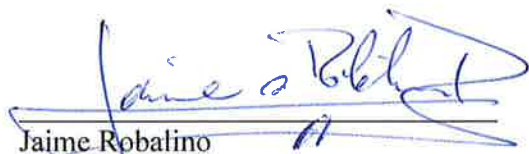
The Connecticut Supreme Court petition, SC 250303, is closed following the March 24, 2026 denial of certification. Applicant cannot file a new stay motion in that closed petition proceeding. The stay-review mechanism was instead invoked in AC 47828, and that application has now been denied.

The remaining Law Day is August 18, 2026. Unless this Court grants immediate relief, the state proceedings may irreversibly alter Applicant's property rights before the Court has an opportunity to determine whether to grant the pending Petition for Writ of Certiorari.

Applicant therefore respectfully requests an immediate administrative stay and a stay of the August 18, 2026 Law Day pending disposition of the Petition for Writ of Certiorari, together with such other and further relief as the Court deems just and proper.

Dated: August 13, 2026

Respectfully submitted,



Jaime Robalino
Applicant, Pro Se
41 Tally Ho Ln
Stamford, CT 06905
203-832-5171
robalinojaime@gmail.com
August 13, 2026

CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2026, I served a true and correct copy of the foregoing updated Emergency Application for Stay of State Court Proceedings on counsel for Respondent, and on the Clerk of the Connecticut Superior Court, Judicial District of Stamford/Norwalk, by electronic mail and/or first-class mail, addressed as follows:

McCalla Raymer Leibert Pierce, LLP - Respondent's Counsel
280 Trumbull Street, 23rd Fl
Hartford, CT 06103

Civil Clerk, Connecticut Superior Court
Judicial District of Stamford/Norwalk
123 Hoyt Street, Stamford, Connecticut 06905

Maria Robalino
41 Tally Ho Ln
Stamford, CT 06905


Jaime Robalino 

APPENDIX

TABLE OF CONTENTS OF APPENDIX

App. 1 — Superior Court At Stamford, Connecticut Order Denying Defendant's Emergency Stay Of Proceedings, dated May 21, 2026 (ENT. #171.01) [by Hon. John P. Regan] A-2

App. 2 — Superior Court at Stamford, Connecticut Order Denying Defendant's Second Emergency Motion For Stay Of Proceedings, dated July 8, 2026 (ENT. #174.01) [by Hon. Robert Genuario] A-3

App. 3 — Superior Court at Stamford, Connecticut Order Denying Motion Open Judgment And Extend The Law Day, dated July 8, 2026 (ENT. # 175.01) [by Hon. Robert Genuario] A-4

App. 4 — Connecticut Appellate Court Order Denying Emergency Motion For Stay Of Proceedings And Law Day, dated August 11, 2026 (Denied 08/11/2026) A-5

App. 5 — Connecticut Supreme Court Order Denying Petition For Certification, dated March 24, 2026 (Denied 03/24/2026) A-6

App. 6 — Emergency Motion For Stay Of Proceedings And Law Day filed with the Connecticut Appellate Court, dated August 11, 2026 (Denied 08/11/2026) A-7

DOCKET NO: FSTCV206045824S

SUPERIOR COURT

ORDER 445556

U.S. BANK NATIONAL ASSOCIATION AS
TRUSTEE FOR HARB

JUDICIAL DISTRICT OF STAMFORD
AT STAMFORD

V.
ROBALINO, JAIME Et Al

5/21/2026

ORDER

ORDER REGARDING:
05/21/2026 170.00 MOTION FOR STAY

The foregoing, having been heard by the Court, is hereby:

ORDER: DENIED

Superior Court Results Automated Mailing (SCRAM) Notice was sent on the underlying motion.

445556

Judge: JOHN P REGAN
Processed by: Sabine Sawyer

This document may be signed or verified electronically and has the same validity and status as a document with a physical (pen-to-paper) signature. For more information, see Section I.E. of the *State of Connecticut Superior Court E-Services Procedures and Technical Standards* (<https://jud.ct.gov/external/super/E-Services/e-standards.pdf>), section 51-193c of the Connecticut General Statutes and Connecticut Practice Book Section 4-4.

DOCKET NO: FSTCV206045824S

SUPERIOR COURT

ORDER 431197

U.S. BANK NATIONAL ASSOCIATION AS
TRUSTEE FOR HARB

JUDICIAL DISTRICT OF STAMFORD
AT STAMFORD

V.
ROBALINO, JAIME Et Al

7/8/2026

ORDER

ORDER REGARDING:
07/07/2026 174.00 MOTION FOR STAY

The foregoing, having been heard by the Court, is hereby:

ORDER: DENIED

Superior Court Results Automated Mailing (SCRAM) Notice was sent on the underlying motion.

431197

Judge: ROBERT LOUIS GENUARIO
Processed by: Sean Donnelly

This document may be signed or verified electronically and has the same validity and status as a document with a physical (pen-to-paper) signature. For more information, see Section I.E. of the *State of Connecticut Superior Court E-Services Procedures and Technical Standards* (<https://jud.ct.gov/external/super/E-Services/e-standards.pdf>), section 51-193c of the Connecticut General Statutes and Connecticut Practice Book Section 4-4.

DOCKET NO: FSTCV206045824S

SUPERIOR COURT

ORDER 431197

U.S. BANK NATIONAL ASSOCIATION AS
TRUSTEE FOR HARB

JUDICIAL DISTRICT OF STAMFORD
AT STAMFORD

V.
ROBALINO, JAIME Et Al

7/8/2026

ORDER

ORDER REGARDING:

07/07/2026 175.00 MOTION TO OPEN JUDGMENT AND EXTEND THE LAW DAY

The foregoing, having been heard by the Court, is hereby:

ORDER: DENIED

Notice of Judgment of Strict Foreclosure (as opened and modified)

Property Address: 41 Tally Ho Lane, Stamford CT 06905

7/8/26: The Motion to Open Judgment and Extend Law Day is Denied. However, the Court is hereby sua sponte opening and extending the law day.

5/21/26: Additional Att. fees \$18,070.00 Additional App fees \$700.00

Judgment of Strict Foreclosure is hereby entered as follows:

Debt: \$1,183,647.81 as of 04/10/2026

Attorney Fees: \$13,559.00

Total: \$1,197,206.81

Appraisal Fee: \$1,005.00

Title Search Fee: \$225.00

Fair Market Value: \$1,055,000.00

LAW DAY SET FOR Tuesday, August 18, 2026, for the owner of the equity of redemption, and subsequent days for subsequent encumbrancers in the inverse order of their priorities.

Judicial Notice (JDNO) was sent regarding this order.

431197

Judge: ROBERT LOUIS GENUARIO

Processed by: Sean Donnelly

This document may be signed or verified electronically and has the same validity and status as a document with a physical (pen-to-paper) signature. For more information, see Section 1.E. of the *State of Connecticut Superior Court E-Services Procedures and Technical Standards* (<https://jud.ct.gov/external/super/E-Services/e-standards.pdf>), section 51-193c of the Connecticut General Statutes and Connecticut Practice Book Section 4-4.

Order On Motion for Stay (P.B. § 61-14) AC 262324

Docket Number: AC47828
Issue Date: 8/11/2026
Sent By: Supreme/Appellate

Order On Motion for Stay (P.B. § 61-14) AC 262324

AC47828 U.S. BANK NATIONAL ASSOCIATION, TRUSTEE v. JAIME ROBALINO ET AL.

Notice Issued: 8/11/2026 9:56:29 AM

Notice Content:

Motion Filed: 8/11/2026
Motion Filed By: Jaime Robalino

Order Date: 08/11/2026

Order: Denied

By the Court
Notice sent to Counsel of Record

Hon. Kevin Tierney, Hon. Robert L. Genuario, Hon. John Regan

Clerk, Superior Court, FSTCV206045824S



PSC-250303

U.S. BANK NATIONAL ASSOCIATION, TRUSTEE

v.

JAIME ROBALINO ET AL.

ORDER ON PETITION FOR CERTIFICATION TO APPEAL

The named defendant's petition for certification to appeal from the Appellate Court, 235 Conn. App. 904 (AC 47828), is denied.

David A. Scalzi, in support of the petition.
Benjamin T. Staskiewicz, in opposition.

Decided March 24, 2026

By the Court,

/s/
Carl D. Cicchetti
Chief Clerk

Notice Sent: March 27, 2026
Petition Filed: February 4, 2026
Clerk, Superior Court, FST-CV20-6045824-8
Hon. Kevin Tierney
Clerk, Appellate Court
Reporter of Judicial Decisions
Staff Attorneys' Office
Counsel of Record

162-

**APPELLATE COURT
STATE OF CONNECTICUT**

APPELLATE COURT NO: A.C. 47828	:	APPELLATE COURT HARTFORD, CT
U.S. BANK NATIONAL ASSOCIATION TRUSTEE		SUPPERIOR COURT NO: FST-CV20-6045824-S
VS		SUPREME COURT NO: SC 250303
JAIME ROBALINO ET AL	:	AUGUST 10, 2026

**EMERGENCY MOTION FOR REVIEW AND
EMERGENCY APPLICATION FOR STAY OF PROCEEDINGS AND LAW DAY**

**PURSUANT TO PRACTICE BOOK §§ 61-14 AND 66-6
URGENT — LAW DAY SCHEDULED FOR AUGUST 18, 2026
RELATED CONNECTICUT SUPREME COURT PETITION NO. SC 250303
RELATED UNITED STATES SUPREME COURT PETITION FOR WRIT OF
CERTIORARI**

Pursuant to Practice Book Section 61-14 and 66-6, the Appellant Jaime Robalino hereby respectfully files his Emergency Motion For Stay Of Proceedings And Law Day. The Defendant-Appellant seeks an emergency hearing and relief. In support of this motion the Appellant represents:

I. BRIEF HISTORY

The Appellant / Defendant Jaime Robalino filed this appeal on July 22, 2024. The appeal was dismissed on September 30, 2025 (AC-47828). The Appellant's Petition For Certification to the Connecticut Supreme Court was Denied on March 24, 2026 (SC 250303). A Writ Of Certiorari has been filed with the U.S. Supreme Court. The new Law Day is scheduled for August 18, 2026. The Appellant is now needing to file this Emergency Application For Stay Of Proceedings And Law Day with the Appellate Court, and has filed an Emergency Application For Stay Of State Court Proceedings with the U.S. Supreme Court.

II. EMERGENCY NATURE OF THIS APPLICATION

The Defendant/Appellant, Jaime Robalino, respectfully moves this Court for emergency relief staying the proceedings in the Superior Court, Judicial District of Stamford-Norwalk, including the Law Day presently scheduled for August 18, 2026, pending disposition of Defendant's Petition for Writ of Certiorari now before the Supreme Court of the United States.

This application presents an extraordinary and time-sensitive procedural circumstance. The underlying appeal is U.S. Bank National Association, Trustee v. Jaime Robalino, et al., AC 47828. The Connecticut Appellate Court affirmed the judgment and remanded the matter for further proceedings.

Defendant thereafter sought certification from the Connecticut Supreme Court, Petition No. SC 250303. Certification was denied. Defendant subsequently sought review by the Supreme Court of the United States through a Petition for Writ of Certiorari.

Defendant also submitted an Emergency Application for Stay of the State Court Proceedings and Law Day to the Supreme Court of the United States. The Supreme Court returned that emergency application because Defendant was required first to seek a stay from the appropriate state court.

Defendant therefore presents this emergency application to the Connecticut Appellate Court in the disposed appellate matter AC 47828. The August 18, 2026 Law Day is imminent. Unless this Court acts immediately, the Superior Court proceeding may occur before the Supreme Court of the United States has an opportunity to determine whether to grant certiorari.

III. PROCEDURAL HISTORY REQUIRING EMERGENCY RELIEF

1. This matter arises from a foreclosure proceeding in the Superior Court for the Judicial District of Stamford-Norwalk.
2. Defendant Jaime Robalino prosecuted an appeal in this Court under AC 47828.
3. On September 30, 2025, this Court issued its decision affirming the judgment and remanding the matter for further proceedings according to law.
4. Defendant thereafter sought certification to the Connecticut Supreme Court, docketed as SC 250303.
5. The Connecticut Supreme Court subsequently denied the Petition for Certification.

6. Defendant thereafter sought review by the Supreme Court of the United States through a Petition for Writ of Certiorari.
7. Defendant's federal petition remains pending before the Supreme Court of the United States.
8. The Supreme Court of the United States returned Defendant's Emergency Application for Stay and required Defendant first to seek relief from the appropriate state court.
9. The Superior Court has denied two separate Emergency Motions for Stay of the State Court Law Day and Proceedings.
10. The Superior Court has also denied Defendant's Motion to Open Judgment and Extend the Law Day.
11. The Superior Court nevertheless continues to maintain the August 18, 2026 Law Day.
12. Defendant therefore seeks emergency relief from this Court pursuant to Practice Book §§ 61-14 and 66-6.

IV. THIS COURT IS THE APPROPRIATE STATE APPELLATE COURT

Defendant respectfully submits this application to the Connecticut Appellate Court under AC 47828 rather than filing a new motion in the Connecticut Supreme Court, because the appropriate procedural vehicle for seeking review of the Superior Court's stay rulings is a motion directed to the appellate matter in which the appellate proceedings occurred.

Practice Book § 61-14 provides the mechanism for appellate review concerning stays of execution where the trial court has denied or refused a stay. Practice Book § 66-6 provides the mechanism for a written motion for review concerning a trial court order relating to a stay of execution.

Connecticut appellate authority recognizes that a party seeking appellate review of a trial court's stay ruling proceeds by motion for review. See *Brennan v. Brennan Associates*, 316 Conn. 677 (2015); *Lawrence v. Cords*, 165 Conn. App. 473, 479–80 (2016); *Wachovia Mortgage, FSB v. Toczek*, 194 Conn. App. 480 (2019).

The present application is not an attempt to reopen the merits of the underlying appeal. It is an emergency request directed solely to preservation of the status quo and prevention of the August 18, 2026 Law Day while Defendant seeks review by the Supreme Court of the United States.

V. THE UNITED STATES SUPREME COURT HAS REQUIRED DEFENDANT TO FIRST SEEK STATE-COURT RELIEF

Defendant has already sought emergency relief from the Supreme Court of the United States. The Supreme Court returned the Emergency Application because Defendant was required first to seek relief from the appropriate court below.

Defendant now does exactly that. The present application provides the Connecticut appellate court with the opportunity to determine whether the State Court proceedings should be stayed before Defendant renews his emergency application to the Supreme Court of the United States.

Defendant is not asking this Court to decide whether the Supreme Court of the United States should grant certiorari. Defendant asks this Court to preserve the status quo so that the Supreme Court of the United States may make that determination without the state proceedings rendering the requested federal review ineffectual.

VI. THE AUGUST 18, 2026 LAW DAY CREATES IMMEDIATE AND IRREPARABLE PREJUDICE

The requested relief is urgent because the Superior Court has scheduled the Law Day for August 18, 2026.

If the Law Day proceeds, Defendant faces the possibility that the state court judgment will be carried out before the Supreme Court of the United States determines whether to grant review. The harm is not merely monetary; the purpose of a stay is to preserve the status quo and prevent appellate review from becoming practically meaningless.

In *First Connecticut Capital, LLC v. Homes of Westport, LLC*, 113 Conn. App. 409, 417–19 (2009), the Appellate Court addressed the operation of the stay provisions in connection with foreclosure proceedings and recognized that applicable stay provisions may prohibit a foreclosure sale from proceeding.

In *Wachovia Mortgage, FSB v. Toczek*, 194 Conn. App. 480 (2019), the Appellate Court addressed the interaction of appellate stays and foreclosure law days.

VII. THE REQUESTED STAY IS NECESSARY TO PRESERVE THE STATUS QUO

The requested stay is narrowly tailored. Defendant does not request that this Court decide the merits of the Petition for Writ of Certiorari or any federal issue presented to the Supreme Court

of the United States.

Defendant requests only that the Superior Court be temporarily prevented from proceeding with the August 18, 2026 Law Day and proceedings implementing or enforcing the judgment while the Supreme Court of the United States considers Defendant's pending Petition for Writ of Certiorari and any renewed application for emergency relief.

Without a stay, the status quo may be destroyed. With a stay, the Plaintiff suffers only a temporary delay while the federal judicial process determines whether further review will occur.

VIII. THE STATE COURT HAS ALREADY DENIED TWO EMERGENCY STAY REQUESTS

The Superior Court has already considered and denied two Emergency Motions for Stay. The Superior Court also denied the Motion to Open Judgment and Extend the Law Day.

Those rulings are precisely why Defendant now seeks appellate review. The repeated denial of relief at the trial-court level demonstrates that further relief cannot reasonably be expected from the Superior Court before the August 18 Law Day.

IX. THE EQUITIES FAVOR AN EMERGENCY STAY

13. Defendant faces potentially irreparable harm if the Law Day proceeds before the Supreme Court determines whether to grant certiorari.
14. Plaintiff suffers no comparable irreparable injury from a temporary stay preserving the existing status quo.
15. The requested stay is limited to the August 18, 2026 Law Day and proceedings enforcing or implementing the judgment pending further order.
16. The public interest favors orderly judicial review while Defendant complies with the Supreme Court of the United States' direction to first seek state-court relief.

X. EMERGENCY TEMPORARY STAY SHOULD ISSUE IMMEDIATELY

Because the Law Day is scheduled for August 18, 2026, Defendant respectfully requests that the Court issue an immediate temporary stay before that date.

Defendant respectfully requests an order substantially as follows:

IT IS HEREBY ORDERED that the August 18, 2026 Law Day in the Superior Court, Judicial District of Stamford-Norwalk, and all proceedings

- 5 -

to enforce, implement, execute, or otherwise carry out the judgment in U.S. Bank National Association, Trustee v. Jaime Robalino, et al., including any proceeding that would alter the status quo during the pendency of Defendant's Petition for Writ of Certiorari before the Supreme Court of the United States, are temporarily STAYED pending further order of this Court.

XI. REQUEST FOR EXPEDITED CONSIDERATION

17. Immediate consideration of this Emergency Motion;
18. An immediate temporary stay of the August 18, 2026 Law Day;
19. A stay of all proceedings in the Superior Court that would enforce, implement, execute, or carry out the judgment during the pendency of Defendant's emergency application;
20. That the stay remain in effect pending disposition of Defendant's Petition for Writ of Certiorari by the Supreme Court of the United States, or until further order of this Court; and
21. Such other and further relief as this Court deems just and appropriate.

XII. LEGAL GROUNDS

Pursuant to Practice Book §§ 61-14 and 66-6, the Defendant / Appellant Jaime Robalino hereby accordingly seeks an emergency stay of the foreclosure proceedings and pending Law Day of August 18, 2026. The Defendant / Appellant as stated has filed a Writ Of Certiorari with the U.S. Supreme Court and requests the Court Grant a stay through the determination of the U.S. Supreme Court appeal.

Good Cause Shown

The facts, law, and information as submitted and offered from above establishes Good Cause and the granting of this motion for the stated Emergency Stay Of State Foreclosure Proceedings.

XIII. CONCLUSION

Defendant Jaime Robalino respectfully submits that this is an extraordinary circumstance warranting immediate appellate intervention. He has pursued the Connecticut appellate process, sought certification in Connecticut Supreme Court Petition No. SC 250303, and filed a Petition for Writ of Certiorari with the Supreme Court of the United States. The Supreme Court returned the emergency application because Defendant was required first to seek relief from the

appropriate state court.

The Superior Court has denied two Emergency Motions for Stay and the Motion to Open Judgment and Extend the Law Day, while the August 18, 2026 Law Day remains scheduled.

Defendant now respectfully seeks the state appellate relief necessary to comply with the Supreme Court of the United States' directive. The requested stay does not ask this Court to prejudge the federal petition. It asks only that the status quo be preserved while the Supreme Court determines whether it will exercise its jurisdiction.

For these reasons, Defendant respectfully requests that this Court GRANT the Emergency Motion for Review; issue an immediate temporary stay of the August 18, 2026 Law Day; stay all further proceedings that would enforce, implement, execute, or carry out the judgment; maintain the status quo pending further order of this Court and/or disposition of Defendant's pending Petition for Writ of Certiorari; and grant such other and further relief as the Court deems just and appropriate.

Dated: August 10, 2026

The Appellant
(Jaime Robalino)
Respectfully Submitted,

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