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## Certified Specialist, Appellate Law, California Board of Legal Specialization Licensed in California & Arizona

March 23, 2018

Mr. Jorge E. Navarrete, Clerk Supreme Court of California 350 McCallister St. San Francisco, CA 94102-3600

### Re: People v. Mora and Rangel (No. S079925) Oral Argument April 4, 2018 New Authorities Letter

To The Honorable Justices of the California Supreme Court:

Appellant Ruben Rangel, through undersigned counsel, wishes to supplement his arguments with authorities issued since the filing of the Reply Brief as follows:

- (1) *People v. Brooks* (2017) 3 Cal.5th 1 in regard to Issue VI (AOB pp. 105-125; RB 38-39) and Issue X. (AOB pp. 159-167; RB pp. 46-48.)
- (2) *People v. Sanchez* (2016) 63 Cal.4th 665 in regard to Issue XIII. (AOB pp.181-199; RB pp.52-55.)
- (3) *Hurst v. Florida* (2016) 577 U.S. \_\_\_\_, 136 S.Ct. 616, 193 L.Ed.2d 504 in regard to Issue XX. (AOB pp. 280-322; RB pp.78-79.)

Sincerely,

## <u>|s| 7ara K. Hoveland</u>

Tara K. Hoveland Attorney for Ruben Rangel

## CERTIFICATE OF SERVICE

I, the undersigned, certify:

That I am a citizen of the United States, over the age of eighteen years, and not a party to the within cause; I am employed in the City and County of Los Angeles, State of California; my business address is 1034 Emerald Bay Rd., #235, South Lake Tahoe, California 96150.

On this date I caused to be served on the interested parties hereto, a copy of **APPELLANT RANGEL'S NOTICE OF SUPPLEMENTAL AUTHORITIES** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States Mail at South Lake Tahoe, California, address as set forth below:

Ruben Rangel #P-43300 SQSP, 2-E1-20 San Quentin, CA 94974

On this same date, I submitted the same document to all other parties by submitting a true and correct copy thereof, in .pdf format, my means of the CA Supreme Court Truefiling online document submission facility:

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct, that this Certificate has been executed on March 23, 2018 at South Lake Tahoe, California 96150.

<u>|s| 7ara K. Hoveland</u>

#### STATE OF CALIFORNIA

Supreme Court of California

# **PROOF OF SERVICE**

STATE OF CALIFORNIA

Supreme Court of California

Case Name: **PEOPLE v. MORA (JOSEPH) & RANGEL (RUBEN)** Case Number: **S079925** 

Lower Court Case Number:

- 1. At the time of service I was at least 18 years of age and not a party to this legal action.
- 2. My email address used to e-serve: tarahoveland@gmail.com
- 3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

Filing TypeDocument Title	
ADDITIONAL CITES FOR ORAL ARGUMENT	Rangels additional cites for oral argument

Service Recipients:			
Person Served	Email Address	Туре	Date / Time
eService California Appellate Project California Appellate Project 000000	filing@capsf.org		3/23/2018 4:56:12 PM
John Yang Office of the Attorney General 192938	john.yang@doj.ca.gov		3/23/2018 4:56:12 PM
John Yang CA Attorney General's Office - Los Angeles 192938	john.yang@doj.ca.gov		3/23/2018 4:56:12 PM
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Tara Hoveland Law Office of Tara K. Hoveland 167746	tarahoveland@gmail.com		3/23/2018 4:56:12 PM

This proof of service was automatically created, submitted and signed on my behalf through my agreements with TrueFiling and its contents are true to the best of my information, knowledge, and belief.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

--Date

# /s/Tara Hoveland

Signature

### Hoveland, Tara (167746)

Last Name, First Name (PNum)

### Law Office of Tara K. Hoveland

Law Firm