

SUPREME COURT COPY

STATE OF CALIFORNIA

Edmund G. Brown Jr, Governor

OFFICE OF THE STATE PUBLIC DEFENDER

C. Delaine Renard, Senior Deputy State Public Defender

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SUPREME COURT
FILED

January 21, 2016

JAN 22 2016

Hon. Frank A. McGuire, Clerk
Supreme Court of California
350 McAllister Street
San Francisco CA 94102-3600

Frank A. McGuire Clerk

Deputy

Re: *People v. Townsel*, No. S022998

Dear Mr. McGuire:

Oral argument in the above-referenced case has been calendared for 1:30 pm., on Tuesday, February 9, 2016. At that hearing, I intend to argue that the trial court had a sua sponte duty to suspend the criminal proceedings and initiate proceedings to determine appellant's competency as a result of the developmental disability of mental retardation by appointing the director of the Regional Center, or his or her designee, to evaluate appellant; further, the failure to do so violated appellant's rights under state law and the Due Process Clause of the Federal Constitution, was prejudicial per se, and demands unqualified reversal of the judgment. (Argument I of Appellant's Opening and Reply Briefs)

Thank you for bringing this letter to the Court's attention.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "C. Delaine Renard", written over a large, stylized scribble.

C. Delaine Renard
Senior Deputy State Public Defender

Attorneys for Appellant

cc: Louis Vasquez, Deputy Attorney General

DEATH PENALTY

DECLARATION OF SERVICE

Re: *People v. Anthony Letrice Townsel*

Superior Court No. 8926
Supreme Court No. S022998

I, KECIA BAILEY, declare that I am over 18 years of age, and not a party to the within cause; my business address is 1111 Broadway, 10th Floor, Oakland, California 94607, that I served a true copy of the attached:

APPELLANT'S FOCUS LETTER

on each of the following, by placing the same in an envelope addressed (respectively) as follows:

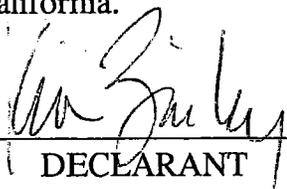
Louis Vasquez
Supervising Deputy Attorney General
Office of the Attorney General
2550 Mariposa Mall, Room 5090
Fresno, CA 93721

Mr. Anthony Letrice Townsel, H-10300
CSP-SQ
3-EB-22
San Quentin, CA 94974

Each said envelope was then, on January 21, 2016, sealed and deposited in the United States Mail at Alameda, California, the county in which I am employed, with the postage thereon fully prepaid.

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

Executed on January 21, 2016, at Oakland, California.



DECLARANT