

**COPY**

IN THE SUPREME COURT OF THE STATE OF CALIFORNIA

In re

**RENO,**

On Habeas Corpus.

**, CAPITAL CASE**

S124660

Los Angeles County Superior Court No. A445665

**RESPONDENT'S BRIEF IN OPPOSITION TO MOTION FOR ORDER**

**SUPREME COURT**

**FILED**

JUN 18 2008

Frederick K. Ohlrich Clerk

Deputy

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**DEATH PENALTY**

IN THE SUPREME COURT OF THE STATE OF CALIFORNIA

In re

**RENO,**

On Habeas Corpus.

**CAPITAL CASE**

S124660

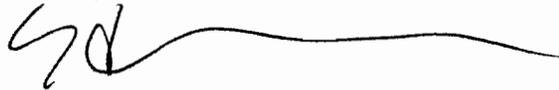
Reno, an inmate at San Quentin State Prison, is represented by Peter Giannini and James S. Thomas in this habeas corpus petition filed on May 20, 2008. In 1994, Reno changed his legal name from Harold Ray Memro to Reno. Reno contends in the instant petition that prison personnel inconsistently deliver legal and non-legal mail addressed to Reno in violation of his constitutional rights. Reno requests that the Court order prison personnel to change their records, including their computer system, to identify Reno by his current legal name and not by his former name.

On June 18, 2008, prison personnel changed the account name entry in the DPPS computer system screen used by the facility's mail room to indicate that Reno is the current legal name of the inmate committed as Harold Ray Memro. (Ex. 1, ITAS Trust Account Display.) Additionally, San Quentin mail room personnel have been re-notified to process and deliver mail addressed to Reno. Thus, Reno's legal and non-legal mail will now reach him when it is addressed to his current legal name.

Dated: June 18, 2008

Respectfully submitted,

EDMUND G. BROWN JR.  
Attorney General of the State of California

A handwritten signature in black ink, appearing to read 'SGW', followed by a long horizontal flourish line.

STEVEN G. WARNER  
Deputy Attorney General

Attorneys for Warden Robert L. Ayers, Jr.

**EXHIBIT 1**

TS210B

CALIFORNIA DEPARTMENT OF CORRECTIONS  
ITAS TRUST ACCOUNT DISPLAY

----- ACCOUNT INFORMATION ----- SPECIAL ITEMS -----

ACCOUNT NUMBER: D63100  
ACCOUNT NAME: MEMRO (AKA RENO), HAROLD RAY  
ACCOUNT TYPE: I  
CURRENT BALANCE: 0.00  
HOLD BALANCE: 0.00  
ENCUM. BALANCE: 0.00  
AVAILABLE: 0.00  
PRIVILEGE GROUP: D  
LAST CANTEEN: 12/10/2007

----- HOUSING LOCATION ----- ARRIVAL INFORMATION -----

FACILITY: SQ  
BED/CELL NUMBER: EB1 00000000104S  
ARRIVAL DATE: 10/10/2007  
ARRIVAL STATUS: MDRTN  
FROM LOCATION: OPS GREENBRAE  
ARRIVAL COMMENT:

TS210BA BEGINNING DATE FOR TRANSACTION DISPLAY: / /  
Type a starting date, OR press ENTER for all transactions, OR press F5, F6, F8

**DECLARATION OF SERVICE BY U.S. MAIL**

Case Name: **In re Reno**

Case No.: **S124660**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

On June 18, 2008, I served the attached

**RESPONDENT'S BRIEF IN OPPOSITION TO MOTION FOR ORDER WITH  
EXHIBIT 1**

by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the internal mail collection system at the Office of the Attorney General at 455 Golden Gate Avenue, Suite 11000, San Francisco, CA 94102-7004, addressed as follows:

**Los Angeles County District  
Attorney's Office  
The Honorable Steve Cooley  
Headquarters  
210 West Temple Street, Suite 18000  
Los Angeles, CA 90012-3210**

**Saor Stetler  
Thomson & Stetler  
819 Delaware Street  
Berkeley, CA 94710**

**Peter Giannini  
Giannini & Campbell  
11755 Wilshire Blvd., 15<sup>th</sup> Floor  
Los Angeles, CA 90025-1501**

**James S. Thomson  
Thomas & Stetler  
819 Delaware Street  
Berkeley, CA 94710**

**California Appellate Project  
520 S. Grand Avenue, 4th Flr.  
Los Angeles, CA 90071-2600**

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on **June 18, 2008**, at San Francisco, California.

J. Baker

Declarant



Signature