

SUPREME COURT COPY

LAW OFFICE OF
KATHY R. MORENO
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October 1, 2015

SUPREME COURT
FILED

OCT - 5 2015

California Supreme Court
350 McAllister Street, Room 1295
San Francisco, CA 94102

Frank A. McGuire Clerk

Deputy

Re: ADDENDUM TO FOCUS LETTER for Oct. 6, 2015 oral argument
People v. Huber Joel Mendoza, S143743

Dear Clerk:

In the focus letter sent to the Court on September 1, I stated that in oral argument in the above-entitled case, I expect to focus on the constitutional insufficiency of the evidence in support of the jury verdict that appellant was competent to stand trial. (Argument I in Opening Brief.) I would like to add the following related arguments:

1. Arg. II [court erred in refusing to re-instate competency proceedings after the defense showed substantial changes in appellant's circumstances];
2. Arg. III [appellant's absence from evidentiary portions of the guilt phase, due to his mental state, and without a person waiver of presence, violated his state and constitutional rights];
3. Arg.V [imposition of a death sentence on a mentally ill defendant violates the Eighth Amendment].

Attached to this letter is a Certificate of Service on the Deputy Attorney General who will argue the case. I also left a detailed voice message with the deputy on September 30, 2015

Sincerely,



KATHY R. MORENO
Attorney for Huber Mendoza

Certificate of Service on
Atty General & Huber Mendoza attached

RECEIVED

OCT 05 2015

CLERK SUPREME COURT

DEATH PENALTY

CERTIFICATE OF SERVICE

I, Kathy Moreno, certify that I am over 18 years of age and not a party to this action. I have my business address at P.O. Box 9006, Berkeley, CA 94709-0006. I have made service of the foregoing ADDENDUM TO FOCUS LETTER by depositing in the United States mail on October 1, 2015, a true and full copy thereof, to the following:

Attorney General ATTN Christina Hitomi Simpson
1300 I St., Ste. 125
P. O. Box 944255
Sacramento CA 94244-2550

I hereby declare that the above is true and correct.
Signed under penalty of perjury this 1st day of October, 2015 ___
in Berkeley, CA.



KATHY MORENO

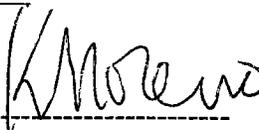
AMENDED CERTIFICATE OF SERVICE

I, Kathy Moreno, certify that I am over 18 years of age and not a party to this action. I have my business address at P.O. Box 9006, Berkeley, CA 94709-0006. I have made service of the foregoing *ADDENDUM TO FOCUS LETTER* by depositing in the United States mail on October 1, 2015, a true and full copy thereof, to the following:

Attorney General ATTN Christina Hitomi Simpson
1300 I St., Ste. 125
P. O. Box 944255
Sacramento CA 94244-2550

Huber Mendoza
F28288
San Quentin, CA 94974

I hereby declare that the above is true and correct.
Signed under penalty of perjury this 1st day of October, 2015
in Berkeley, CA.


KATHY MORENO

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OCT 05 2015
CLERK SUPREME COURT