Tara K. Hoveland Attorney at Law 1034 Emerald Bay Rd., # 235 South Lake Tahoe, CA 96150 (530) 541-2505 phone / (530) 364-5807 fax

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

March 19, 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) Focus Letter re: Ruben Rangel

Dear Mr. Navarrete:

At the oral argument scheduled before this Court on April 4, 2018 at 1:30 p.m. in Los Angeles, California, I intend to focus on the following issue(s):

The cumulative prejudicial effect of the discovery-related errors affecting the guilt phase as argued in Appellant Rangel's issues I, II and III.

The prejudicial effect of inadmissible gang evidence presented in the penalty phase as outlined in Appellant Rangel's issue XIII and in light of *People v. Sanchez* (2016) 63 Cal.4th 665.

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

Sincerely,

Isl 7ara K. Hoveland
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 FOCUS LETTER** 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

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 19, 2018 at South Lake Tahoe, California 96150.

Isl Tara X. Hoveland

Supreme Court of California

Jorge E. Navarrete, Clerk and Executive Officer of the Court

Electronically FILED on 3/19/2018 by Regine Ho, Deputy Clerk

## 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 Type	Document Title	
LETTER	Appellant Rangels Focus Letter	

Service Recipients:

Person Served	Email Address	Type	Date / Time
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California Appellate Project		Service	6:05:38 PM
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John Yang	john.yang@doj.ca.gov	e-	3/19/2018
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Michael Satris	satris@sbcglobal.net	e-	3/19/2018
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Office of the State Public Defender 100474		Service	6:05:38 PM
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Office of the State Public Defender		Service	6:05:38 PM
62784			
Tara Hoveland	tarahoveland@gmail.com	e-	3/19/2018
Law Office of Tara K. Hoveland		Service	6:05:38 PM
167746			

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.

<del></del>
Date
/s/Tara Hoveland
Signature
Hoveland, Tara (167746)
Last Name, First Name (PNum)
Law Office of Tara K. Hoveland

Law Firm