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May 20, 2016

Honorable Frank A. McGuire
Court Administrator and Clerk
Supreme Court of California
350 McAllister Street
San Francisco, California 94102

SUPREME COURT
FILED

MAY 23 2016

Frank A. McGuire Clerk
Deputy

RE *People v. Daniel Sanchez Covarrubias*
California Supreme Court Case No.S075136
Additional Authorities Letter

Dear Mr. McGuire:

Counsel may refer to one or more of the following additional authorities during argument currently calendared for June 1, 2016 at 2:00 PM:

Re: AOB Claim 1

People v. Leon (2015) 61 Cal.4th 569

Re: AOB Claim 10

Ocampo v. Vail (9th Cir. 2011) 649 F.3d 1098, 1115.) ["The Supreme Court has long recognized that accomplices are questionable witnesses."]

People v. Bryant (2011) 198 Cal.App.4th 134, 153-154 ["Viewing the evidence in the light most favorable to Bryant, as is required [citation] we conclude that there is substantial evidence from which a reasonable jury could find that Bryant did not subjectively appreciate that her conduct endangered Robert's life...the jury could have believed Bryant's testimony that she never intended to kill Robert."]

Re: AOB Claim 53

People v. Banks (2015) 61 Cal.4th 788

DEATH PENALTY

Yours very truly,

Thomas Lundy
Attorney for Appellant
Daniel Sanchez Covarrubias

PROOF OF SERVICE

I DECLARE THAT:

I am a resident of Sonoma County and employed in the County of Sonoma, State of California.

I am over the age of eighteen and not a party to the within action. My business address is: 2777 Yulupa Avenue PMB 179, Santa Rosa, California 95405. On May 20, 2016, I served the within: **Additional Authorities Letter** on the interested parties in said cause, by placing a true copy thereof enclosed in a sealed envelope with first class postage thereon, fully prepaid, in the United States mail, at Santa Rosa, California, addressed as follows:

**Bridgette Billeter
Office of the Attorney General
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004**

**California Appellate Project
101 Second Street, Suite 600
San Francisco, CA 94105**

**Daniel Sanchez Covarrubias P-19600
CSP-SQ 4-EY-35
San Quentin, CA 94974**

I declare under penalty of perjury that the foregoing is true and correct and executed on May 20, 2016 at Santa Rosa, California.

Tom Lundy