
ATTORNEY AT LAW

P.O. BOX 172

COOL, CALIFORNIA 95614-0172

TELEPHONE (530) 885-7718

May 11, 2020

Mr. Jorge E. Navarrete
Clerk and Executive Officer of the Court
Supreme Court of California
350 McAllister St.
San Francisco, C A 94102

Re: People v. Daniel T. Silveria and John R. Travis – S062417
Oral Argument Set for May 20, 2020

Dear Mr. Navarrete:

On behalf of Appellant John R. Travis, I expect to focus on the following issues during oral argument:

Travis AOB Argument I – Trial court ruling precluding counsel from offering in mitigation of the penalty, at the penalty retrial, a juror and an alternate juror from the first penalty trial, who had become well-acquainted with Appellant after the first penalty trial.

Travis AOB Argument III – Trial court ruling precluding counsel from mentioning the word “mercy” during argument to the jury, and refusal to instruct on mercy (tethered to the circumstances of the crime and the background of the offender) as a factor in mitigation.

Each of these issues will also encompass Travis AOB Argument XII – Facts and legal principles demonstrating prejudice from the various errors at the penalty retrial.

Very truly yours,

Mark E. Cutler
Counsel for John R. Travis

DECLARATION OF SERVICE BY MAIL

I, Mark E. Cutler, declare as follows:

I am a citizen of the United States, over the age of 18 years and not a party to the within action; my place of employment and business address is P.O. Box 172, Cool, CA 95614-0172.

On May 11, 2020 I served the attached

ORAL ARGUMENT FOCUS LETTER

by placing a true copy thereof in an envelope addressed to the persons named below at the addresses shown, and by sealing and depositing said envelope in the United States Mail at Cool, California, with postage thereon fully prepaid. There is delivery service by United States Mail at each of the places so addressed, or there is regular communication by mail between the place of mailing and each of the places so addressed.

John Raymond Travis, K-57201
CSP-SQ
NBN-6-N-24
San Quentin, CA 94974

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

Executed this 11th day of May, 2020, at Cool, California.

Mark E. Cutler

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. SILVERIA (DANIEL TODD) & TRAVIS (JOHN RAYMOND)**

Case Number: **S062417**

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: **cutler@mac.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	2020-05-11 My Focus Letter to CSC

Service Recipients:

Person Served	Email Address	Type	Date / Time
Mark Cutler Attorney at Law cutler@mac.com	cutler@mac.com	e-Serve	5/11/2020 1:19:22 PM
Office Office Of The State Public Defender - Ok Timothy J. Foley, Senior Deputy State Public Defender 111558	tim.foley@ospd.ca.gov	e-Serve	5/11/2020 1:19:22 PM
Josephine Espinosa California Dept of Justice, Office of the Attorney General	josephine.espinosa@doj.ca.gov	e-Serve	5/11/2020 1:19:22 PM
Arthur Beever Office of the Attorney General 242040	arthur.beever@doj.ca.gov	e-Serve	5/11/2020 1:19:22 PM
Attorney General San Francisco Office Attorney General San Francisco Office	SFAG.Docketing@doj.ca.gov	e-Serve	5/11/2020 1:19:22 PM
Dennis Fischer Law Offices of Dennis A. Fischer 037906	dennisafischer@gmail.com	e-Serve	5/11/2020 1:19:22 PM
Office Office Of The State Public Defender - Ok Andrew Shear, Deputy State Public Defender 000000	docketing@ospd.ca.gov	e-Serve	5/11/2020 1:19:22 PM
Habeas Corpus Resource Center	docketing@hrc.ca.gov	e-Serve	5/11/2020 1:19:22 PM

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.

5/11/2020

Date

/s/Mark Cutler

Signature

Cutler, Mark (cutler@mac.com)

Last Name, First Name (PNum)

Mark E Cutler, Attorney-at-law

Law Firm