



**XAVIER BECERRA**  
**Attorney General**

**State of California**  
**DEPARTMENT OF JUSTICE**

455 GOLDEN GATE AVENUE, SUITE 11000  
SAN FRANCISCO, CA 94102-7004

Public: (415) 510-4400  
Telephone: (415) 510-3801  
Facsimile: (415) 703-1234  
E-Mail: Elizabeth.Hereford@doj.ca.gov

October 23, 2020

The Honorable Jorge E. Navarrete  
Clerk and Executive Officer  
Supreme Court of California  
350 McAllister Street  
San Francisco, CA 94102-4797

RE: *People v. Irving Alexander Ramirez*  
Supreme Court of California, Case No. S155160  
Alameda County Superior Court, Case No. 151080  
Focus Letter

Dear Mr. Navarrete:

This letter specifies the issues on which I expect to focus during oral argument in *People v. Ramirez*, Case No. S155160, scheduled for argument on November 3, 2020 at 1:30 p.m. As respondent's counsel, I intend to focus on the issues identified in appellant's counsel's focus letter. Appellant's counsel has advised that she will focus on Claims V and VII (as numbered in the respondent's brief).

V. The Victim Impact Evidence Was Properly Admitted

VII. The Trial Court Properly Responded to the Jury's Questions During Penalty Phase Deliberations

In addition, I will be prepared to address any matter of interest to the Court.

Respectfully submitted,

*/s/ Elizabeth W. Hereford*

ELIZABETH W. HEREFORD  
Deputy Attorney General  
State Bar No. 282956

For XAVIER BECERRA  
Attorney General

EWH:

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

Case Name: **People v. Irving Ramirez**  
No.: **S155160**

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 collecting and processing electronic and physical correspondence. 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 with postage thereon fully prepaid that same day in the ordinary course of business. Correspondence that is submitted electronically is transmitted using the TrueFiling electronic filing system. Participants who are registered with TrueFiling will be served electronically. Participants in this case who are not registered with TrueFiling will receive hard copies of said correspondence through the mail via the United States Postal Service or a commercial carrier.

On October 23, 2020, I electronically served the attached **Respondent's Focus Letter** by transmitting a true copy via this Court's TrueFiling system. Because one or more of the participants in this case have not registered with the Court's TrueFiling system or are unable to receive electronic correspondence, on October 23, 2020, I placed a true copy thereof enclosed in a sealed envelope 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:

The Honorable Nancy O'Malley  
District Attorney  
Alameda County District Attorney's  
Office  
[Via TrueFiling Only]

Superior Court of California  
County of Alameda  
Criminal Division  
Rene C. Davidson Courthouse  
1225 Fallon Street, Room 107  
Oakland, CA 94612-4293

CAP - SF  
California Appellate Project (SF)  
345 California Street  
Suite 1400  
San Francisco, California 94104

Maria J. Morga  
Deputy State Public Defender  
Office of the State Public Defender  
Oakland City Center  
111 Broadway, 10th Floor  
Oakland, CA 94607  
(2 copies)

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on October 23, 2020, at San Francisco, California.

\_\_\_\_\_  
T Pham  
Declarant

\_\_\_\_\_  
*/s/ T Pham*  
Signature

**STATE OF CALIFORNIA**  
Supreme Court of California

***PROOF OF SERVICE***

**STATE OF CALIFORNIA**  
Supreme Court of California

Case Name: **PEOPLE v. RAMIREZ (IRVING ALEXANDER)**

Case Number: **S155160**

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: **Elizabeth.Hereford@doj.ca.gov**
3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

<b>Filing Type</b>	<b>Document Title</b>
LETTER	S155160 - Respondent's Focus Letter

Service Recipients:

<b>Person Served</b>	<b>Email Address</b>	<b>Type</b>	<b>Date / Time</b>
Maria Morga Office of the State Public Defender 197218	maria.morga@ospd.ca.gov	e-Serve	10/23/2020 2:37:51 PM
Liza Sabio Alameda County Superior Court Pro Per	lsabio@alameda.courts.ca.gov	e-Serve	10/23/2020 2:37:51 PM
Attorney Attorney General - San Francisco Office Elizabeth Winsor Hereford, Deputy Attorney General 282956	Elizabeth.Hereford@doj.ca.gov	e-Serve	10/23/2020 2:37:51 PM
Office Office Of The State Public Defender - Ok Evan Young, Supv. Deputy State Public Defender 000000	cscreminders@ospd.ca.gov	e-Serve	10/23/2020 2:37:51 PM
Office Office Of The State Public Defender-Sac Timothy Foley, Sr. Deputy State Public Defender 000000	docketing@ospd.ca.gov	e-Serve	10/23/2020 2:37:51 PM
Docket Unit - California Department of Justice	SFAG.Docketing@doj.ca.gov	e-Serve	10/23/2020 2:37:51 PM
Alameda County District Attorney's Office	ACDAadocket@acgov.org	e-Serve	10/23/2020 2:37:51 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.

10/23/2020

Date

/s/Tuyen Pham

---

Signature

Hereford, Elizabeth (282956)

---

Last Name, First Name (PNum)

California Dept of Justice, Office of the Attorney General

---

Law Firm