

STATE OF CALIFORNIA

EDMUND G. BROWN JR., *Governor*

**OFFICE OF THE STATE PUBLIC DEFENDER**

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March 30, 2018

Mr. Jorge E. Navarrete, Clerk and Executive Officer  
Supreme Court of California  
350 McAllister St.  
San Francisco, CA 94102-3600

Re: *People v. People v. Mora and Rangel* (No. S079925)

Dear Mr. Navarrete:

Oral argument in the above-referenced case has been calendared for 1:30 p.m. on Wednesday, April 4, 2018. While preparing for oral argument, I came across an additional authority that I wanted to bring to the Court's attention. I apologize for not discovering this authority sooner. That authority is *People v. Smith* (2015) 61 Cal.4th 18, 53-61 (judgment of death reversed because the defendant was not allowed to present evidence of prison security measures which would have countered aggravating evidence and argument suggesting that he would be a dangerous life prisoner).

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

Sincerely,

/S/

PETER R. SILTEN  
Supervising Deputy State Public Defender

**DECLARATION OF SERVICE BY MAIL**

*People v. Joseph Mora and Ruben Rangel*

Supreme Court No. S079925

I, the undersigned, declare as follows:

I am over the age of 18, not a party to this cause. I am employed in the county where the mailing took place. My business address is 1111 Broadway, 10th Floor, Oakland, California, 94607. I served a copy of the following document(s):

**APPELLANT MORA'S SUPPLEMENTAL AUTHORITIES  
LETTER DATED MARCH 30, 2018**

by enclosing it in envelopes and

/ / **depositing** the sealed envelope with the United States Postal Service with the postage fully prepaid;  
/X/ **placing** the envelopes for collection and mailing on the date and at the place shown below following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

The envelopes were addressed and mailed on **March 30, 2018**, as follows:

Joseph Adam Mora, #P-43301  
CSP-SQ  
2-D-35  
San Quentin, CA 94974

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed on March 30, 2018, at Oakland, California.

/s/ Tamara Reus

\_\_\_\_\_  
TAMARA REUS

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: **nina.wilder@ospd.ca.gov**
3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

| Filing Type                        | Document Title                                  |
|------------------------------------|---|
| ADDITIONAL CITES FOR ORAL ARGUMENT | App Moras Supp Authorities Letter March 30 2018 |

Service Recipients:

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| eService California Appellate Project<br>California Appellate Project<br>000000 | filing@capsf.org          | e-Service | 3/30/2018<br>12:56:53 PM |
| John Yang<br>CA Attorney General's Office - Los Angeles<br>192938               | john.yang@doj.ca.gov      | e-Service | 3/30/2018<br>12:56:53 PM |
| LAAWT Docketing<br>CA Attorney General's Office - Los Angeles                   | DocketingLAAWT@doj.ca.gov | e-Service | 3/30/2018<br>12:56:53 PM |
| Michael Sattris<br>Attorney at Law<br>67413                                     | sattris@sbcglobal.net     | e-Service | 3/30/2018<br>12:56:53 PM |
| Tara Hoveland<br>Law Office of Tara K. Hoveland<br>167746                       | tarahoveland@gmail.com    | e-Service | 3/30/2018<br>12:56:53 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.

--

Date

/s/Nina Wilder

Signature

Wilder, Nina (100474)

Last Name, First Name (PNum)

Office of the State Public Defender

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Law Firm