

SUPREME COURT COPY

Victor S. Haltom
Attorney at Law

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428 J Street, Suite 350
Sacramento, California 95814

Telephone: (916) 444-8663
FAX#: (916) 447-2988
e-mail: vshjah@aol.com

September 18, 2015

Clerk of the Court
California Supreme Court
350 McAllister Street
San Francisco, CA 94102

**SUPREME COURT
FILED**

SEP 23 2015

Frank A. McGuire Clerk
Deputy

RE: *People v. Sandoval*
Case No. S115872
Focus Letter and Citation to Additional Authority


Dear Clerk:

At oral argument in the above-referenced matter, I intend to focus on two issues raised in the parties' briefing. The first issue is the *Witherspoon-Witt* issue, which is argument XIII in the briefing. The second issue, set forth in argument XIX, pertains to the question whether the trial court, violated Mr. Sandoval's constitutional rights by refusing to allow defense counsel to argue a sentence of life without parole would result in Mr. Sandoval spending the rest of his life in prison.

With respect to the *Witherspoon-Witt* issue, additional authority upon which I intend to address is this court's recent opinion in *People v. Leon* (2015) 61 Cal.4th 569. Within the *Leon* opinion, pages 590-593 contain the discussion upon which I intend to focus. With respect to the second specified issue, I intend to focus on the recent opinion handed down in *People v. Smith* (2015) 61 Cal.4th 18, 58-59.

Thank you for your time and consideration.

Very Truly Yours,


Victor S. Haltom

DEATH PENALTY

CERTIFICATE OF SERVICE

I am a citizen of the United States and a resident of the County of Sacramento. I am over the age of eighteen years and not a party to the above-entitled action; my business address is 428 J Street, Suite 350, Sacramento, California 95814.

On the date below, I served the following document(s):

FOCUS LETTER

BY MAIL. I caused an envelope containing the above-specified document(s), with postage thereon fully prepaid, to be placed in the United States Mail at Sacramento, California addressed as follows:

BY PERSONAL SERVICE. I caused such document(s) to be delivered by hand to the offices of the person(s) listed below:

BY FACSIMILE SERVICE. I caused the document(s) to be served via facsimile to the person(s) listed below:

Scott Kauffman, Esq.
California Appellate Project
101 Second Street, Suite 600
San Francisco, CA 94105

Timothy M. Weiner
Deputy Attorney General
300 South Spring Street, Suite 1702
Los Angeles, CA 90013

Mr. Ramon Sandoval, Jr.
P.O. Box T-92424
San Quentin, CA 94974

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

Executed on September 21, 2015 at Sacramento, California.



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