

**COPY**

IN THE SUPREME COURT OF THE STATE OF CALIFORNIA

In re

**RENO,**

On Habeas Corpus.

**CAPITAL CASE**

S124660

Los Angeles County Superior Court No. A445665

**RESPONDENT'S SUPPLEMENTAL BRIEF IN OPPOSITION TO MOTION  
FOR ORDER**

SUPREME COURT  
**FILED**

JUN 23 2008

Frederick K. Ohlrich Clerk

Deputy

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**DEATH PENALTY**

IN THE SUPREME COURT OF THE STATE OF CALIFORNIA

In re

**RENO,**

On Habeas Corpus.

**CAPITAL  
CASE  
S124660**

On June 18, 2008, respondent filed with the Court Respondent's Brief in Opposition to Motion for Order indicating that prison personnel changed the account name field in the DPPS computer system screen used by the facility's mail room to indicate that Reno is the current legal name of the inmate committed as Harold Ray Memro.

However, the next day San Quentin personnel learned that the change to the account name field in the facility's DPPS computer system would not be permanent. The account name field is overwritten each night during the nightly batch process, which re-sets the system to its default data to maintain system-wide consistency.

Therefore, to ensure that Reno receives all mail bearing his legal name, on June 19, 2008, prison personnel posted a memorandum signed by an associate warden outside of Reno's cell and in the facility's mail room, reminding employees that the inmate committed as Harold Ray Memro is now known as Reno, and instructing delivery of mail addressed to both names. (Ex. 1, June 19, 2008, Memorandum signed by Associate Warden D.A. Dacanay.) Accordingly, Reno's legal and non-legal mail will still reach him whether it is addressed to his current legal name or his commitment name.

Dated: June 23, 2008

Respectfully submitted,

EDMUND G. BROWN JR.  
Attorney General of the State of California

A handwritten signature in black ink, appearing to be 'SGW', followed by a long, wavy horizontal line extending to the right.

STEVEN G. WARNER  
Deputy Attorney General

Attorneys for Warden Robert L. Ayers, Jr.

**EXHIBIT 1**

**ATTENTION TIER OFFICERS**

**HENCEFORTH, INMATE MEMRO  
(AKA "RENO") D-63100 IS TO  
RECEIVE HIS MAIL WHETHER IT  
IS ADDRESSED TO HIM AS:**

**INMATE RENO**

**OR**

**INMATE MEMRO**

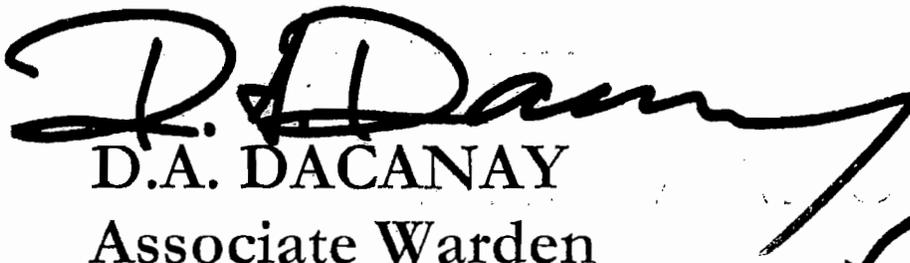
**OR**

**INMATE RENO/MEMRO**

**OR**

**INMATE MEMRO/RENO**

**THIS APPLIES TO MAIL  
DELIVERY ONLY**

  
D.A. DACANAY  
Associate Warden  
Specialized Housing

*6/19/08*

*copy*

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

Case Name: **In re Reno**

Case No.: **S124660**

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 collection and processing of correspondence for mailing with the United States Postal Service. 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 that same day in the ordinary course of business.

On June 23, 2008, I served the attached

**RESPONDENT'S SUPPLEMENTAL BRIEF IN OPPOSITION TO MOTION  
FOR ORDER WITH EXHIBIT 1**

by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, 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:

**Los Angeles County District  
Attorney's Office  
The Honorable Steve Cooley  
Headquarters  
210 West Temple Street, Suite 18000  
Los Angeles, CA 90012-3210**

**Saor Stetler  
Thomson & Stetler  
819 Delaware Street  
Berkeley, CA 94710**

**Peter Giannini  
Giannini & Campbell  
11755 Wilshire Blvd., 15<sup>th</sup> Floor  
Los Angeles, CA 90025-1501**

**James S. Thomson  
Thomas & Stetler  
819 Delaware Street  
Berkeley, CA 94710**

**California Appellate Project  
520 S. Grand Avenue, 4th Flr.  
Los Angeles, CA 90071-2600**

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on **June 23, 2008**, at San Francisco, California.

\_\_\_\_\_  
J. Baker  
Declarant

  
\_\_\_\_\_  
Signature