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January 28, 2019

To: Jorge E. Navarrete  
Clerk and Executive Officer of the Court  
Supreme Court of California

Re: Additional Authorities in *People v. Michael Leon Bell*, S080056

Dear Mr. Navarrete:

This case is currently set for oral argument on February 5, 2019. With the permission of the Court, appellant Michael Bell wishes to submit the following list of new authorities decided since briefing was completed, which may have some bearing on issues presented in this case.

*People v. Seumanu* (2015) 61 Cal.4<sup>th</sup> 1293, 1366-1367: AOB, Argument VIII, pp. 242-256

*People v. Sandoval* (2015) 62 Cal.4<sup>th</sup> 394, 440-443: AOB, Argument VIII, pp. 242-246; AOB Argument XIX, pp. 359-368.

*People v. Blackburn* (2015) 61 Cal.4<sup>th</sup> 1113, 1116-1137; AOB Argument XIII, B, C, & D, pp. 299-312.

*People v. Morris* (2015) 239 Cal.App.4<sup>th</sup> 276, 279-287. AOB Argument XIV, XV, XVI, pp. 316-333.

If the Court has any further questions or requests, please do not hesitate to contact me by email or telephone.

Respectfully submitted,



Melissa Hill

## PROOF OF SERVICE

I reside in the State of New Mexico, Sandoval County. I am over the age of 18 years and a duly-licensed California attorney. I represent Michael Leon Bell, the appellant in this action. My business address is PO Box 2758, Corrales, New Mexico, 87048.

On January 28, 2019, I served the attached letter re new authorities for on the following interested parties by placing true copies thereof, enclosed in a sealed envelope with postage prepaid, in the United States mail in Corrales, New Mexico, addressed as follows:

Michael Leon Bell  
P45400  
CSP-SQ  
San Quentin, CA 94974

The following parties have been served through Truefiling:


Scott Kauffman, California Appellate Project  
[skuffman@capsf.org](mailto:skuffman@capsf.org)

William Kim, Deputy Attorney General  
[William.Kim@doj.ca.gov](mailto:William.Kim@doj.ca.gov)

Gary Wells (habeas corpus counsel)  
[gbwattorney@comcast.net](mailto:gbwattorney@comcast.net)

I declare under penalty of perjury the laws of the State of California that this statement is true.

Executed this 28<sup>th</sup> of January, 2019, at Corrales, New Mexico.

  
\_\_\_\_\_  
Melissa Hill

**STATE OF CALIFORNIA**  
 Supreme Court of California

**PROOF OF SERVICE**

**STATE OF CALIFORNIA**  
 Supreme Court of California

Case Name: **PEOPLE v. BELL (MICHAEL LEON)**

Case Number: **S080056**

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: **hill71218@gmail.com**
3. I served by email a copy of the following document(s) indicated below:

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| LETTER      | S080056LetterBell |

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| Gary Wells<br>Gary B. Wells, Attorney at Law<br>154954                          | gbwattorney@gmail.com      | e-Service | 1/28/2019<br>5:31:56 PM |
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| Melissa Hill<br>Attorney at Law<br>71218  | mhcorrals@me.com           | e-Service | 1/28/2019<br>5:31:56 PM |
| Melissa Hill<br>Attorney at Law<br>71218  | mhcorrals@me.com           | e-Service | 1/28/2019<br>5:31:56 PM |
| Melissa Hill<br>Melissa Hill, Attorney<br>71218                                 | hill71218@gmail.com        | e-Service | 1/28/2019<br>5:31:56 PM |
| William Kim<br>DOJ Sacramento/Fresno AWT Crim                                   | William.Kim@doj.ca.gov     | e-Service | 1/28/2019<br>5:31:56 PM |

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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.

1/28/2019

Date

/s/Melissa Hill

Signature

Hill, Melissa (71218)

Last Name, First Name (PNum)

Melissa Hill, Attorney

Law Firm