Supreme Court of California

Jorge E. Navarrete, Clerk and Executive Officer of the Court

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Supreme Court of California Jorge E. Navarrete, Clerk and Executive Officer of the Court Electronically FILED on 5/22/2020 by April Boelk, Deputy Clerk

SNEDEKER, SMITH & SHORT

Attorneys at Law PMB 422 4110 S.E. Hawthorne Blvd. Portland, Oregon 97214 Tel: (503) 234-3584

Fax: (503) 232-3215

Reply to:

- 2626 Harrison St.
 Oakland, California 94612
 Tel: (510) 839-9230
- P.O. Box 72451
 Davis, California 95617
 Tel: (530) 757-1036

 Av. Electricistas no. 2033 Altos Col. Libertad, C.P. 21030 Mexicali, Baja California México Tel: (52-65) 57-24-58

Michael R. Snedeker* James F. Smith* Lisa R. Short** Lic. Daniel Solorio Ramírez Of Counsel Kami J. White Certified Law Student

*Admitted in California only **Admitted in California and Oregon

May 22, 2020

Honorable Jorge Navarette Clerk, California Supreme Court 350 McAllister Street San Francisco, CA 94102

> Re: <u>People v. Arturo Juarez Suarez</u> No. S105876 Focus Issues

Dear Mr. Navarette,

Please bring to the Court's attention the following "focus issues" for the June 3, 2020, oral argument in the above-entitled case:

1. Argument I (Erroneous interpretation of Code of Civil Procedure Section 229);

2. Argument IV. F (Erroneous dismissal for cause of prospective juror D. B., who unequivocally said she would follow the law);

3. Arguments VII & VIII (invalid Miranda waiver, involuntary confession, failure of the trial court to give weight to either (a) acknowledged failure to inform appellant of his right of access to Mexican Consulate or (b) clear deception by FBI regarding whether agents knew appellant was a Mexican National at the time of his arrest.

Best wishes to you. If you have any questions, please call or write.

Sincerely yours,

/s/ Michael Snedeker Attorney for Appellant ARTURO JUAREZ SUAREZ

DECLARATION OF ELECTRONIC SERVICE

Re: *People v. Arturo Juarez Suarez*, Cal. Supreme Court No. S105876; Napa Co. Super Ct. No. CR 103779. I, the undersigned, declare that I am over 18 years of age, and not a party to the within cause; my business address is PMB 422, 4110 SE Hawthorne Blvd., Portland, Oregon 97214. My electronic service address is <u>m.snedeker@comcast.net</u>. On May 5, 2020, I served a true copy of the attached

FOCUS ISSUES LETTER

on each of the following, by electronic mail, addressed as follows:

Patricia Daniels: pdaniels@capsf.org

California Appellate Project efiling: <u>filing@capsf.org</u>

DECLARATION OF SERVICE BY MAIL

Re: *People v. Arturo Juarez Suarez*, Cal. Supreme Court No. S105876; Napa Co. Super Ct. No. CR 103779. I, the undersigned, declare that I am over 18 years of age, and not a party to the within cause; my business address is PMB 422, 4110 SE Hawthorne Blvd., Portland, Oregon 97214. My electronic service address is <u>m.snedeker@comcast.net</u>. On April 27, 2020, I served a true copy of the attached

FOCUS ISSUES LETTER

on each of the following, by placing same in an envelope (or envelopes) addressed as follows:

Arturo Juarez Suarez #T-47397 CSP-SQ; 4-EB-36 San Quentin, CA 94974 Clerk, Napa County Superior Curt. 825 Brown Street Napa, CA 94559

Each said envelope was then, on May 22, 20 sealed and deposited in the United States mail at Portland, Oregon, Multnomah County, the county in which I am employed, with the postage thereon fully prepaid. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 22, 2020, in Portland, Oregon.

STATE OF CALIFORNIA

Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA

Supreme Court of California

Case Name: **PEOPLE v. SUAREZ (ARTURO JUAREZ)** Case Number: **S105876**

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: m.snedeker@comcast.net
- 3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

Filing Type	Document Title
LETTER BRIEF	focus Issues letter

Service Recipients:

Person Served	Email Address	Туре	Date / Time
Leif Dautch Office of Attorney General 283975	leif.dautch@doj.ca.gov	e-Serve	5/22/2020 4:33:23 PM
Lisa Short Snedeker Smith & Short 88757	liselshort@comcast.net	e-Serve	5/22/2020 4:33:23 PM
Michael Snedeker Snedeker Smith & Short 62842	m.snedeker@comcast.net	e-Serve	5/22/2020 4:33:23 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.

/22/2020		
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/Michael Snedeker		

Snedeker, Michael (62842)

Last Name, First Name (PNum)

Snedeker, Smith and Short

Law Firm