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November 9, 2018

Clerk of the Court
California Supreme Court
350 McAllister Street, Rm 1295
San Francisco, CA 94102

Re: Focus Letter and List of Additional Authorities
December 5, 2018, Morning Calendar
People v. Amezcua (Oswaldo) and Flores (Joseph)
(S133660; LASC KA 050813)

Dear Clerk:

Please inform the Court that I expect to focus on the following two arguments during oral argument, which is set for December 5, 2018. The arguments and the additional authorities for each are set forth below and are identified by the Argument number used in Mr. Amezcua's opening brief.

ARG. II. The trial court committed reversible error by excusing Prospective Juror No. 74 who, despite conscientious reservations about imposing the death penalty, stated repeatedly that she was willing to carry out her duties as a juror in accordance with the Court's instructions and her oath.

Additional authorities. *People v. Woodruff* (2018) 5 Cal.5th 697; *People v. Jones* (2017) 3 Cal.5th 583; *People v. Zaragoza* (2016) 1 Cal.5th 21.

ARG. VIII. The failure to present a penalty phase defense, appellant's express requests and the trial court's consent notwithstanding, violated appellant's right to a reliable determination of the judgment of death.

Additional authority. *McCoy v. Louisiana* (2018) 138 S.Ct. 1500; 200 L.Ed.2d 821.

Very truly yours,

JANYCE KEIKO IMATA BLAIR

PROOF OF SERVICE

I declare that I am over the age of eighteen years and not a party to the within entitled action. My business address is 1609 Border Avenue, Torrance, CA 90501.

On the date below, I served the **Focus Letter and List of Additional Authorities for Oral Argument on behalf of Oswaldo Amezcua** in *People v. Oswaldo Amezcua and Joseph Flores* (S133660; LASC KA050813) on the parties named below either by placing true copies thereof, enclosed in sealed envelope(s) addressed as stated on the attached mailing list, with postage/delivery fee fully prepaid, at Torrance, California, with the U.S. Postal Service or by electronic service at the email address below.

1. Mark Goldrosen
Via email at markgoldro@aol.com
2. Oswaldo Amezcua V76698
3AC12
San Quentin State Prison
San Quentin, CA 94974
3. David H. Goodwin
Via email at dgood18055@aol.com
4. James W. Bilderback
Via email at Bill.Bilderback@doj.ca.gov
5. Viet Nguyen
Via email at viet.nguyen@doj.ca.gov
6. Wes VanWinkle
Via email at tacitus@pacbell.net

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 9, 2018, at Torrance, California.

Janyce Blair

STATE OF CALIFORNIA
 Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
 Supreme Court of California

Case Name: **PEOPLE v. AMEZCUA (OSWALDO) & FLORES (JOSEPH)**
 Case Number: **S133660**
 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: **jkiblair@bleckmanblair.com**
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	Amezcuca Focus Issues Add Authorities Letter

Service Recipients:

Person Served	Email Address	Type	Date / Time
Attorney General - Los Angeles Office Mr. Viet H. Nguyen, Deputy Attorney General LAG	viet.nguyen@doj.ca.gov	e-Service	11/15/2018 11:11:30 AM
Attorney General - Los Angeles Office Mr. Viet H. Nguyen, Deputy Attorney General LAG	viet.nguyen@doj.ca.gov	e-Service	11/15/2018 11:11:30 AM
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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.

11/15/2018

Date

/s/Janyce Blair

Signature

Blair, Janyce (103600)

Last Name, First Name (PNum)

Janyce Blair, Attorney at Law

Law Firm