

KAMALA D. HARRIS
Attorney General

COPY

State of California
DEPARTMENT OF JUSTICE



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SUPREME COURT COPY

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May 19, 2016

The Honorable Frank McGuire
Court Administrator and Clerk of the Court
Supreme Court of California
350 McAllister Street, First Floor
San Francisco, CA 94102-4797

SUPREME COURT
FILED

MAY 19 2016

Frank A. McGuire Clerk

RE: *People v. Daniel Sanchez Covarrubias*
Supreme Court California S.F., San Francisco Branch Case No. S075136
Monterey Superior Court, Case No. SC942212C

Deputy

Dear Mr. McGuire:

This letter specifies the issues on which I expect to focus during oral argument in *People v. Covarrubias*, case no. S075136, scheduled for argument on June 1, 2016, in Los Angeles. As respondent's counsel, I intend to focus on the issues identified in appellant's counsel's focus letter. Appellant's counsel has advised that he will focus on the issues and sub-issues addressed in his Claim 10 (Respondent's Claim 8):

"The jurors were erroneously permitted to convict appellant of the robbery-based charges even if they believed that appellant's only intent was to help retrieve Sanchez's property."

In addition, I will be prepared to address any matter of interest to the Court.

Sincerely,

BRIDGET BILLETER
Deputy Attorney General
State Bar No. 183758

For Kamala D. Harris
Attorney General

DEATH PENALTY

DECLARATION OF SERVICE BY U.S. MAIL

Case Name: **People v. Daniel Sanchez Covarrubias**
No.: **S075136**

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 with postage thereon fully prepaid that same day in the ordinary course of business.

On May 19, 2016, I served the attached **RESPONDENT'S FOCUS ISSUES LETTER** by placing a true copy thereof enclosed in a sealed envelope 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:

Thomas Lundy
Attorney at Law
2777 Yulupa Avenue, PMB 179
Santa Rosa, CA 95405

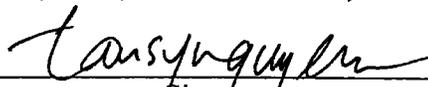
County of Monterey
Salinas Division
Superior Court of California
240 Church Street, Suite 318
Salinas, CA 93901

The Honorable Dean D. Flippo
District Attorney
Monterey County District Attorney's Office
P.O. Box 1131
Salinas, CA 93902

California Appellate Project (SF)
101 Second Street, Suite 600
San Francisco, CA 94105-3647

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 May 19, 2016, at San Francisco, California.

Tan Nguyen
Declarant


Signature