

JACKSON
888 WEST SIXTH STREET, FOURTH FLOOR
LOS ANGELES, CALIFORNIA 90017
TELEPHONE (213) 688-0460
FACSIMILE (213) 624-1942
WWW.WERKSMANJACKSON.COM

MARK J. WERKSMAN
ALAN J. JACKSON
KELLY C. QUINN *
JOSHUA E. RITTER
ELIZABETH S. LITTLE
CALEB E. MASON **
JACQUELINE M. SPARAGNA ***
MEHRUNISA RANJHA

* CERTIFIED SPECIALIST – APPELLATE LAW
THE STATE BAR OF CALIFORNIA
BOARD OF LEGAL SPECIALIZATION
** ADMITTED IN ILLINOIS
*** ADMITTED IN WASHINGTON D.C.

December 17, 2019

Mr. Jorge E. Navarrete, Clerk
Supreme Court of California
350 McAllister Street
San Francisco, CA 94102-3600

Re: *People v. James Michael Fayed*
Supreme Court of California Case No. S198132

Dear Mr. Navarrete:

I will be presenting oral argument in this case on behalf of appellant, James Michael Fayed, in San Francisco on the 1:30 p.m. calendar, on Tuesday, January 7, 2020. At that hearing, I intend to focus my argument on the following issues:

1. Argument A (“THE LOWER COURT IMPROPERLY ADMITTED A RECORDED STATEMENT IN VIOLATION OF APPELLANT’S FOURTH, FIFTH, SIXTH, AND FOURTEENTH AMENDMENT RIGHTS”);
2. Argument E, Section 1, Subdivision A (“THE LOWER COURT ERRONEOUSLY ADMITTED PREVIOUSLY UNDISCLOSED EVIDENCE IN VIOLATION OF APPELLANT’S RIGHT TO COUNSEL AND RIGHT TO A FAIR TRIAL”); and
3. Argument F (“THERE WAS INSUFFICIENT EVIDENCE OF THE SPECIAL CIRCUMSTANCES”).

I have advised opposing counsel of these focus issues.

Thank you for bringing this letter to the Court’s attention.

Sincerely,



Kelly C. Quinn

DECLARATION OF SERVICE
Re: **People v. James Michael Fayed**
Case No.: **S198132**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 888 West Sixth Street, Suite 400, Los Angeles, California 90017.


On December 18, 2019, I served the foregoing document, described as **FOCUS LETTER** on all interested parties listed below by transmitting to all interested parties a true copy thereof as follows:

James Michael Fayed
CDC No. AK-3340
CSP-San Quentin
3-EB-71
San Quentin, CA 94974

Via U.S. Mail

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on December 18, 2019 in Los Angeles, California



Martha Rodriguez

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. FAYED (JAMES
MICHAEL)**

Case Number: **S198132**

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: **kquinn@werksmanjackson.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	FOCUS LETTER

Service Recipients:

Person Served	Email Address	Type	Date / Time
Kelly Quinn Werksman Jackson Hathaway & Quinn 197697	kquinn@werksmanjackson.com	e-Serve	12/18/2019 3:14:32 PM
Attorney Attorney General - Los Angeles Office Office of the Attorney General	docketinglaawt@doj.ca.gov	e-Serve	12/18/2019 3:14:32 PM
Mark Werksman Werksman Jackson & Quinn LLP	mwerksman@werksmanlaw.com	e-Serve	12/18/2019 3:14:32 PM
Mark Werksman Werksman Jackson & Quinn LLP	mwerksman@werksmanjackson.com	e-Serve	12/18/2019 3:14:32 PM
Kelly Quinn Weksman Jackson Hathaway & Quinn, LLP	kcquinn@werksmanlaw.com	e-Serve	12/18/2019 3:14:32 PM
Attorney Attorney General - Los Angeles Office Idan Ivri, Deputy Attorney General 260354	idan.ivri@doj.ca.gov	e-Serve	12/18/2019 3:14:32 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.

12/18/2019

Date

/s/Kelly Quinn

Signature

Quinn, Kelly (197697)

Last Name, First Name (PNum)

Werksman Jackson Hathaway & Quinn

Law Firm