

**ROB BONTA**  
**Attorney General**

**State of California**  
**DEPARTMENT OF JUSTICE**



600 WEST BROADWAY, SUITE 1800  
SAN DIEGO, CA 92101  
P.O. BOX 85266  
SAN DIEGO, CA 92186-5266

Public: (619) 738-9000  
Telephone: (619) 738-9073  
Facsimile: (619) 645-2044  
E-Mail: Daniel.Hilton@doj.ca.gov

February 18, 2022

Jorge E. Navarrete, Clerk and Executive Officer  
Supreme Court of California  
350 McAllister Street, First Floor  
San Francisco, CA 94102-4797

RE: New Authorities Relevant to Oral Argument  
*People v. Mario Salvador Padilla*, Case No. S263375  
California Court of Appeal, Second Appellate District, Case No. B297213

Dear Mr. Navarrete:

This case is set for oral argument on March 1, 2022. At argument, respondent's counsel may refer to the following authorities, which were not available at the time of briefing:

*People v. Esquivel* (2021) 11 Cal.5th 671;

*In re Rodriguez* (2021) 66 Cal.App.5th 952;

California Penal Code section 1170.03, subdivision (a)(2).

Sincerely,

/s/ Daniel J. Hilton  
Daniel J. Hilton  
Deputy Attorney General

For ROB BONTA  
Attorney General

**DECLARATION OF ELECTRONIC SERVICE AND SERVICE BY U.S.  
MAIL**

Case Name: **People v. Mario Salvador Padilla**  
No.: **S263375**

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 collecting and processing electronic and physical correspondence. 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. Correspondence that is submitted electronically is transmitted using the TrueFiling electronic filing system. Participants who are registered with TrueFiling will be served electronically. Participants in this case who are not registered with TrueFiling will receive hard copies of said correspondence through the mail via the United States Postal Service or a commercial carrier.

On February 18, 2022, I electronically served the attached **ADDITIONAL AUTHORITY LETTER** by transmitting a true copy via this Court's TrueFiling system. Because one or more of the participants in this case have not registered with the Court's TrueFiling system or are unable to receive electronic correspondence, on February 18, 2022, I placed a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 600 West Broadway, Suite 1800, P.O. Box 85266, San Diego, CA 92186-5266, addressed as follows:

The Honorable Ricardo R. Ocampo  
Los Angeles County Superior Court  
South Central District  
Compton Courthouse  
200 West Compton Boulevard, Dept. J  
Compton, CA 90220

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on February 18, 2022, at San Diego, California.

Walter Hernandez



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Declarant

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Signature

DH: wh  
LA2020601422

STATE OF CALIFORNIA  
Supreme Court of California

**PROOF OF SERVICE**

STATE OF CALIFORNIA  
Supreme Court of California

Case Name: **PEOPLE v.  
PADILLA**

Case Number: **S263375**

Lower Court Case Number: **B297213**

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: **Daniel.Hilton@doj.ca.gov**
3. I served by email a copy of the following document(s) indicated below:

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Markta Sims Independent Juvenile Defender Program 144324	mpelder@lacba.org	e-Serve	2/18/2022 12:08:08 PM
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David Madeo Office of the Attorney General 180106	david.madeo@doj.ca.gov	e-Serve	2/18/2022 12:08:08 PM
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Los Angeles County District Attorney	truefiling@da.lacounty.gov	e-Serve	2/18/2022 12:08:08 PM
Beatriz Dieringer, Deputy District Attorney	bdieringer@da.lacounty.gov	e-Serve	2/18/2022 12:08:08 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.

2/18/2022

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Date

/s/Walter Hernandez

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Signature

Hilton, Daniel (301189)

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Last Name, First Name (PNum)

Department of Justice, Office of the Attorney General-San Diego

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Law Firm