

## Office of the State Public Defender

Maria Morga  
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October 23, 2020

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

Re: *People v. Irving Alexander Ramirez*.  
California Supreme Court Case No. S155160

Dear Mr. Navarrete:

Oral argument in the above-referenced case has been calendared for November 3, 2020 at 1:30 p.m. I intend to focus my argument on the following claims:

Argument V. [The Trial Court Erred In Admitting Inflammatory Victim Impact Evidence]

Argument VII. [The Death Judgment Must Be Reversed Because The Trial Court's Erroneous Instructions in Response To The Jury's Mid-Deliberation Questions Undercut The Jury's Consideration Of The Mitigating Circumstances]

Thank you for your attention to this matter.

Sincerely,

**/S/ MARIA MORGA**

Maria Morga  
Supervising Deputy State Public  
Defender  
Office of the State Public Defender  
Attorneys for Appellant

## DECLARATION OF SERVICE

Case Name: *People v. Irving Alexander Ramirez*  
Case Number: **Cal. Supreme Court No. S155160**  
**Alameda County Superior Court No. 151080**

I, Andrew Ironside, declare as follows: I am over the age of 18 and not a party to this cause. I am employed in the county where the mailing took place. My business address is 770 L Street, Suite 1000, Sacramento, California, 95814. I served a true copy of the following document:

### ORAL ARGUMENT FOCUS LETTER

by enclosing it in envelopes and placing the envelopes for collection and mailing with the United States Postal Service with postage fully prepaid on the date and at the place shown below following our ordinary business practices.

The envelope was addressed and mailed on **October 23, 2020**, as follows:

Irving Alexander Ramirez  
F-82088  
CSP-SQ  
San Quentin, CA 94974

The following was served the aforementioned document electronically via TrueFiling on **October 23, 2020**:

Elizabeth Hereford  
Deputy Attorney General  
Office of the Attorney General  
455 Golden Gate Avenue, Suite 11000  
San Francisco, CA 94102-3658  
[Elizabeth.Hereford@doj.ca.gov](mailto:Elizabeth.Hereford@doj.ca.gov)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed on **October 23, 2020**, at Sacramento, California.

/S/ ANDREW IRNSIDE

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DECLARANT

STATE OF CALIFORNIA  
Supreme Court of California**PROOF OF SERVICE**STATE OF CALIFORNIA  
Supreme Court of CaliforniaCase Name: **PEOPLE v. RAMIREZ (IRVING ALEXANDER)**Case Number: **S155160**

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: **maria.morga@ospd.ca.gov**
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	2020_10_23_LtrToCSC_FocusLetter_Ramirez

Service Recipients:

Person Served	Email Address	Type	Date / Time
Attorney Attorney General - San Francisco Office Elizabeth Winsor Hereford, Deputy Attorney General 282956	Elizabeth.Hereford@doj.ca.gov	e-Serve	10/23/2020 9:43:59 AM
Office Office Of The State Public Defender-Sac Timothy Foley, Sr. Deputy State Public Defender 000000	docketing@ospd.ca.gov	e-Serve	10/23/2020 9:43:59 AM

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.

10/23/2020

Date

/s/Andrew Ironside

Signature

Morga, Maria (197218)

Last Name, First Name (PNum)

Office of the State Public Defender

Law Firm