No. S058734 (CAPITAL CASE)

In the Supreme Court of the State of California

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff and Respondent,

v.

KARL HOLMES, HERBERT MCCLAIN, AND LORENZO NEWBORN,
Defendants and Appellants.

Los Angeles County Superior Court, Case No. BA092268
The Honorable J. D. Smith, Judge

SUPPLEMENTAL RESPONDENT'S BRIEF

ROB BONTA (SBN 202668)
Attorney General of California
LANCE E. WINTERS (SBN 162357)
Chief Assistant Attorney General
JAMES WILLIAM BILDERBACK II (SBN 161306)
Senior Assistant Attorney General
DANA M. ALI (SBN 247037)
Supervising Deputy Attorney General
JAIME L. FUSTER (SBN 137582)
Deputy Attorney General
SETH P. MCCUTCHEON (SBN 278234)
Deputy Attorney General
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
Telephone: (213) 269-6133
Fax: (916) 731-2122
DocketingLAAWT@doj.ca.gov
Seth.McCutcheon@doj.ca.gov
Attorneys for Respondent

June 23, 2021

TABLE OF CONTENTS

Page

TABLE OF AUTHORITIES

Page

CASES

TABLE OF AUTHORITIES
(continued)

Page

INTRODUCTION

On May 11, 2021, this Court issued an order directing respondent to file a supplemental brief responding to Appellant Newborn's Supplemental Brief ("ANSB"), in which appellant urges this Court to adopt the approach taken to analyze a *Batson*[1] claim in *Flowers v. Mississippi* (2019) 139 S.Ct. 2228. (ANSB 8-13.) Specifically, appellant argues that this Court should engage in comparative analysis when reviewing step one *Batson* claims such as his. (ANSB 8-13, 34-37.)

Appellant's argument should be rejected as *Flowers* is a straightforward step three case and is therefore not instructive in the way appellant suggests. Further, this Court has consistently recognized that comparative analysis is unwarranted at step one when neither the trial court nor this Court have posited potential reasons behind challenges to excused jurors. In any event, appellant's *Batson* claim fares no better under comparative analysis.

---

[1] In *Batson v. Kentucky* (1986) 476 U.S. 79, the United States Supreme Court set out a three-step process in the trial court to determine whether a peremptory challenge is race-based in violation of the equal protection clause. First, the defendant must make a prima facie showing that the prosecutor had exercised a peremptory challenge on the basis of race. (*Id.* at pp. 96-97.) If the defendant makes this prima facie case showing, the burden then shifts to the prosecution to provide a race-neutral explanation for its challenge. (*Id.* at p. 97.) If the prosecutor tenders a race-neutral explanation, in step three, the trial court must then decide whether the defendant has proved purposeful racial discrimination. (*Johnson v. California* (2005) 545 U.S. 162, 168.)

ARGUMENT

FLOWERS V. MISSISSIPPI IS INAPPLICABLE IN APPELLANT'S CASE AND COMPARATIVE ANALYSIS IS UNWARRANTED AND, IN ANY EVENT, UNAVAILING

A. *Flowers* is a step three case and does not mandate comparative analysis in step one cases

Appellant contends that *Flowers* enumerated six categories of evidence to be considered "[w]ith respect to the step one determination whether a prima facie case of discriminatory use of peremptory challenges has occurred." (ANSB 9; see also ANSB 9-10.) Although appellant concedes this Court has yet to adopt *Flowers* (see ANSB 11), he highlights four instances where the Court has cited *Flowers* and urges it to conform its current *Batson* analysis, as explained in *People v. Johnson* (2019) 8 Cal.5th 475, to that which is set forth in *Flowers*. Specifically, appellant identifies two factors enumerated in *Flowers* but absent in this Court's enumerated factors in *Johnson*, comparative analysis and a prosecutor's misrepresentation of the record when defending a peremptory challenge. (ANSB 12.) Appellant asks this Court to align with *Flowers* and, as a matter of course, undertake comparative analysis during its step one *Batson* analysis, which, when applied in appellant's case, allegedly would demonstrate an inference of discrimination. (ANSB 12-13, 34-38.)[2]

---

[2] The second factor appellant identifies, a prosecutor's misrepresentation of the record while defending a peremptory challenge, is irrelevant in the instant matter as no actual reasons

Appellant's argument should be rejected.[3] First, *Flowers* is a step three case and does not hold that the enumerated factors are to be applied at step one. In *Flowers*, the trial court concluded that the prosecutor had offered race-neutral reasons for each of his peremptory challenges against Black prospective jurors. (*Flowers*, *supra*, 139 S.Ct. at p. 2237.) After the Mississippi Supreme Court agreed with the trial court, the United States Supreme Court reversed the judgment. (*Id.* at p. 2251.) In concluding that the trial court had erred, the high court listed six factors that trial courts may consider "in evaluating whether racial discrimination occurred." (*Id.* at p. 2243.) Contrary to appellant's assertion (see ANSB 9-10), the high court did *not* suggest that these factors were relevant in the determination of whether a prima facie case of racial discrimination has been established.

Moreover, the authority of this Court that appellant relies on does not support his reading of *Flowers*. (See ANSB 11.) *People v. Baker* (2021) 10 Cal.5th 1044, *People v. Miles* (2020) 9 Cal.5th 513, and *People v. Triplett* (S262052, review denied 8/31/2020) were all step three cases, and none of them suggests

---

were put on the record by the prosecutor. Appellant does not suggest otherwise.

[3] Appellant spends the majority of his supplemental brief repeating his statistical arguments, the framing of the challenged jurors as "responsible, upstanding and contributing members of the community," and his responses to the arguments in the Respondent's Brief ("RB"). (See ANSB 14-33.) Accordingly, respondent will not repeat arguments already made in the Respondent's Brief.

that the factors enumerated in *Flowers* are applicable to step one determinations. Although *People v. Johnson*, *supra*, 8 Cal.5th 475 is a step one case, the citation to *Flowers* in Justice Liu's dissent is *not* for the proposition that appellant suggests and nowhere in the opinion is it suggested that comparative analysis should be considered a necessary aspect of a step one analysis. Actually, *Flowers* was cited in *Johnson* simply to stress the recent underscoring by the high court that *Batson* expressly prohibited the striking of Black jurors on the assumption that they will be biased in a case where the defendant is Black. (See *People v. Johnson, supra*, 8 Cal.5th at p. 529 (dis. opn. of Liu, J.).)

Indeed, this Court has repeatedly declined to conduct comparative analysis in a step one *Batson* analysis, finding that it is inappropriate and unhelpful. (See, e.g., *People v. Sanchez* (2016) 63 Cal.4th 411, 439-440; *People v. Streeter* (2012) 54 Cal.4th 205, 225-226, fn. 6; *People v. Clark* (2011) 52 Cal.4th 856, 907-908 & fn. 13; *People v. Taylor* (2010) 48 Cal.4th 574, 616-617; *People v. Hawthorne* (2009) 46 Cal.4th 67, 80, fn. 3; *People v. Howard* (2008) 42 Cal.4th 1000, 1019-1020; *People v. Bonilla* (2007) 41 Cal.4th 313, 343, 347-350.) Although this Court has recently acknowledged that comparative analysis *may* be helpful in a step one analysis, it has only done so when either it or the trial court has posited possible reasons for the peremptory challenges at issue, and has not gone so far as to endorse comparative analysis as a matter of course. (See *People v. Rhoades* (2019) 8 Cal.5th 393, 432, fn. 17.) Here, neither the trial

court nor the prosecutor stated reasons regarding the challenged jurors.

B. Appellant's claim fails even under comparative analysis

Nevertheless, even if comparative analysis is employed here, appellant's claim fares no better. As an initial matter, appellant has incorrectly identified the jurors to be considered in the undertaking of comparative analysis. Comparative juror analysis compares the responses of the challenged prospective jurors with those of seated jurors *who were not* members of the challenged jurors' cognizable group. (*People v. Miles, supra*, 9 Cal.5th at p. 541; *People v. Winbush* (2017) 2 Cal.5th 402, 422; see also *Miller-El v. Dretke* (2005) 545 U.S. 231, 241.) However, appellant repeatedly compares the challenged Black female jurors to seated Black female jurors. (See ANSB 34-35 [identifying Juror Nos. 34, 63, and 105 as jurors who responded similarly to challenged jurors on questions 151 and 152 of the jury questionnaire]; ANSB 35-36 [identifying Juror No. 63 who similarly had a relative with past legal troubles]; ANSB 36 [identifying Juror Nos. 34, 63, 98, and 105 as those who responded similarly to a challenged juror on question 117(a) of the jury questionnaire]; ANSB 37 [identifying Juror No. 63 who had previously sat on a hung jury].)[4] Accordingly, respondent will not address the arguments

[4] As acknowledged by appellant (see Appellant Newborn's Opening Brief, Appendix A at p. 5), Juror Nos. 34, 63, 98, and 105 were Black females. Additionally, and missing from appellant's Appendix, Juror No. 133, who ultimately filled seat 1, was identified by the trial court as a Black male. (See 13CT 3422.)

pertaining to seated Black female jurors as they do not adduce evidence tending to prove purposeful discrimination. (See *Miller-El, supra*, 545 U.S. at p. 241.)

Next, an examination of the *relevant* seated jurors demonstrates that they were not similarly situated with the challenged jurors. Appellant begins his analysis by distilling down respondent's arguments regarding the challenged jurors, choosing *some* of the valid reasons supporting their excusal, and then points to seated jurors who are allegedly *somewhat* similarly situated. For example, appellant asserts that the only three reasons supporting Juror No. 37's excusal were her answers to questions 151 and 152 of the jury questionnaire (ANSB 34-35), that her deceased son had been "in trouble with the law" (ANSB 35), and her answer to question 117(a) of the jury questionnaire (ANSB 36). Appellant's portrayal ignores the other important points respondent made such as Juror No. 37's indication that she would have difficulty accepting eyewitness testimony and difficulty imposing the death penalty. (See RB 135-138.)

Regardless, the faulty comparison appellant conducts is unpersuasive. Appellant points to several seated jurors, Juror Nos. 29, 30, 104, 124, and 133, as also having answered questions 151 and 152 similarly. (ANSB 35.) Of these five seated jurors, only one (Juror No. 29) shared more than this single aspect with Juror No. 37. (See ANSB 34-37.) Indeed, Juror No. 29 appears to be similarly situated to Juror No. 37 in his responses to questions

151, 152, and 117(a).[5] (See ANSB 34-37.) However, these selective points of comparison are insufficient to be dispositive. (*People v. Miles, supra*, 9 Cal.5th at p. 543 [comparison of a challenged juror to a seated juror on one of multiple reasons supporting a challenge is relevant but not necessarily dispositive]; *People v. Armstrong* (2019) 6 Cal.5th 735, 784-785 [overlap on one concern will seldom be sufficient]; *People v. Winbush*, *supra*, 2 Cal.5th at p. 443 [pretext is established, however, when the compared jurors have expressed "a substantially similar *combination* of responses," in all material respects, to the jurors excused], quoting *People v. DeHoyos* (2013) 57 Cal.4th 79, 107.)

Additionally, despite appellant's failure to acknowledge respondent's highlighting of Juror No. 37 as one who would have trouble imposing the death penalty, appellant suggests Juror No. 29 was similar in that regard. (See ANSB 37.) However, appellant's attempt to portray Juror No. 29 as having "far more" reservations about imposing the death penalty than Juror No. 37 is disingenuous. (ANSB 37.) Juror No. 37 indicated that she believed the death penalty was used randomly and disproportionately on minorities, the poor, and the uneducated.

---

[5] Respondent notes that Juror No. 37 disagreed "somewhat" with questions 151 and 152 (ANSB 34), and "strongly" disagreed with question 117(a) (ANSB 36), while Juror No. 29 "strongly" disagreed with questions 151 and 152 (ANSB 35; 14SCT-I 3969-3970), and "moderately" disagreed with question 117(a) (ANSB 36.) For sake of argument respondent will assume that, although different in degree, the responses of Juror Nos. 37 and 29 are similar.

(15SCT-I 4294-4295.) Further, Juror No. 37 indicated that there were some circumstances where it would be impossible to vote for the death penalty. (15SCT-I 4296) When asked whether she supported the death penalty but would be unable to personally vote to impose it, Juror No. 37 stated that she did not believe that she would "ever have the chance to experience this." (15SCT-I 4296.) Juror No. 37 also believed that life in prison was a worse punishment than death for some. (15SCT-I 4297.) Finally, Juror No. 37 indicated that she was unsure whether she would nullify special circumstance charges in order to avoid the issue of imposing the death penalty. (15SCT-I 4300.)

Conversely, Juror No. 29 indicated that he was "in favor" of the death penalty. (14SCT-I 3967.) He believed the death penalty was randomly imposed but only because executions were not being carried out. (14SCT-I 3968.) It was not impossible for Juror No. 29 to impose the death penalty, and he believed the death penalty was worse than life in prison. (14SCT-I 3969-3970.) Although he indicated that it would be difficult to make a decision as to the imposition of the death penalty (see 14SCT-I 3971-3972; ANSB 35), he also stated that he would fulfill his duty based on the evidence (14SCT-I 3972). In sum, Juror No. 29 did not have more reservations about the death penalty than Juror No. 37. Truly, from the prosecution's perspective, Juror No. 29 was a favorable juror.[6]

---

[6] In addition, Juror No. 29 stated that he was involved with his neighborhood watch program (14SCT-1 3944), that he had

Finally, appellant compares Juror No. 37 to Juror No. 79 and argues they were similarly situated based on their answers to question 117(a), and their having a relative who had been in trouble with the law. (ANSB 35-36.) Along with failing to demonstrate similarity in a material way (*People v. Winbush*, *supra*, 2 Cal.5th at p. 443), appellant incorrectly likens Juror No. 37's son's experience with Juror No. 79's spouse's conviction for driving while intoxicated ("DUI"). (ANSB 35.) Despite the attempt to downplay Juror No. 37's son's history as merely having "been in trouble with the law" (ANSB 35), it is clear that these two jurors were starkly different in terms of their relatives' experience with law enforcement and how they themselves were affected. As respondent fully discussed in the Respondent's Brief, Juror No. 37's son had frequent run-ins with the law, one of which resulted in severe injury to her son, and Juror No. 37 was not happy with how she had been treated by police. (RB 135-136.) In contrast, Juror No. 79 stated that her husband had been convicted for DUI seven years earlier, but that he was a recovering alcoholic who had been sober the previous six years, and that she did not feel that anyone had been treated unfairly in

---

friends in law enforcement (14SCT-1 3952), that he believed the criminal justice system adequately protected the rights of the accused (14SCT-I 3948) and that the "system" worked (14SCT-1 3951), and that he had some knowledge of the instant offense and believed it was a "senseless crime" (14SCT-1 3954). These factors made Juror No. 29 appealing to a prosecutor.

the ordeal. (21SCT-I 6000-6001.)[7] Lastly, Juror No. 79 would have been very appealing to a prosecutor as she had previously been employed by the Los Angeles Police Department. (See 12RT 815; 21SCT-I 6002.)

Regarding the remaining jurors at issue, Juror Nos. 9, 48, 53, 88, and 94, appellant simply makes more single-aspect comparisons and ignores either the import of those aspects or the additional aspects identified in the Respondent's Brief. For example, Juror Nos. 9, 48, and 53 are simply categorized as, and compared to, jurors who similarly responded to questions 151 and 152 of the questionnaire. (See ANSB 34-37.) Appellant ignores the fact that Juror No. 9 gave repeated odd responses in her questionnaire, indicated that differing versions of an event by witnesses would *automatically* raise a reasonable doubt, indicated that she was inclined to impose life in prison over the death penalty, and stated that she would choose life in prison if she learned that a defendant had problems while growing up. (See RB 141-142.) Additionally, Juror No. 9 indicated that it would be impossible to vote for death under some circumstances but it would not be impossible to vote against death under any circumstance. (See 11SCT-I 3152.) Appellant also ignores the

---

[7] Appellant appears to interpret Juror No. 79's usage of the phrase "last time" (see 21SCT-I 6000) as meaning that her husband had been convicted "on more than one occasion" (see ANSB 35); however, this extrapolation is entirely speculative. In any event, even multiple DUI convictions pale in comparison to Juror No. 37's son's experiences.

fact that Juror No. 48 left much of the questionnaire blank, including much of the section related to views on the death penalty; in the portions she did complete, she indicated that she would choose to impose life in prison over the death penalty. (See RB 139-140.)[8] Appellant also ignores the fact that Juror No. 53 disclosed that she believed the role of a juror was to be a "buffer" and engage in jury nullification if necessary, and that she believed the death penalty was only appropriate for the "criminally insane." (See RB 138-139.) Appellant's narrow focus on these jurors' responses to questions 151 and 151 is insufficient. (*People v. Winbush*, *supra*, 2 Cal.5th at p. 443.)

Similarly, regarding Juror No. 94, appellant chooses to solely focus on the juror's difficulty in imposing the death penalty and ignores the fact that her domestic abuse issues raise glaring concerns for a prosecutor relying on the jury's careful consideration of domestic abuse as an aggravating factor. (See RB 143-144.) And, again, appellant only relies on seated Juror No. 29 to support the argument that a seated juror was similarly situated in terms of their hesitancy to impose the death penalty (see ANSB 36-37); however, as discussed above, that contention is disingenuous.

Regarding Juror No. 88, appellant deconstructs respondent's argument down to two points that he then fails to properly

---

[8] The repeated failure to respond to the questionnaire was especially problematic due to the fact that the trial court was only allowing follow-up voir dire and expressly stated that the questionnaire was the primary tool the attorneys had to get to know the jurors. (See 11RT 531.)

characterize. (See ANSB 35-37.) Appellant first discusses Juror No. 88's sister's and cousins' incarcerations but fails to acknowledge that Juror No. 88's child's father also had been incarcerated for various crimes, including armed robbery and accomplice to murder. As with Juror No. 37, Juror No. 88's relationships to incarcerated individuals was starkly different from Juror No. 79's spouse's DUI, and from Juror No. 133's forgotten incident. (See RB 142-143; see also ANSB 35-36.)

Appellant then compares the jury service of Juror No. 88 with Juror No. 124, positing that they are similar. (ANSB 37.) Appellant is wrong. Juror No. 88 served on two juries, both of which hung. Juror No. 88 admitted to being in the minority on at least one of those two juries. (See RB 142.) In contrast, Juror No. 124 had served on four juries with only one that hung, and Juror No. 124 did not discuss the split. (See 13RT 935.) Additionally, although she later changed her response, Juror No. 88 initially indicated she could not personally vote to impose the death penalty. (See 12RT 843.) Moreover, the court took notice that Juror No. 88 was visibly shaking during voir dire and appeared extremely nervous. (12RT 840.) In sum, these two jurors, although both serving on at least one panel that hung, were not similarly situated. In any event, appellant yet again fails to provide more than a single-aspect comparison. (*People v. Winbush*, *supra*, 2 Cal.5th at p. 443.)

In his final argument, appellant contends that the prosecutor failed to engage in meaningful voir dire as to four of the challenged jurors. (ANSB 37-38.) This contention is not only

undercut by his inability to allege less than meaningful voir dire as to *all* of the challenged jurors but it also ignores what was noted above, that the trial court did not allow the attorneys to conduct general voir dire. Rather, the trial court only allowed specific follow-up questions based on the responses in the questionnaires and the court's voir dire. (See 11RT 531.) Indeed, the trial court repeatedly reminded the attorneys *not* to conduct general voir dire and to only ask pointed follow-up questions. (See 11RT 564, 638; 12RT 798; 13RT 883, 889, 1000.) Tellingly, appellant does not attempt to compare the voir dire of the four challenged jurors to that of any seated jurors and the reason is obvious, the prosecutor conducted limited voir dire as to all prospective and seated jurors.

CONCLUSION

For the foregoing reasons, and those previously discussed in the Respondent's Brief, respondent respectfully requests that this Court affirm the judgment and the sentence of death.

Respectfully submitted,

ROB BONTA
Attorney General of California
LANCE E. WINTERS
Chief Assistant Attorney General
JAMES WILLIAM BILDERBACK II
Senior Assistant Attorney General
DANA M. ALI
Supervising Deputy Attorney General
JAIME L. FUSTER
Deputy Attorney General

SETH P. MCCUTCHEON
Deputy Attorney General
Attorneys for Respondent

June 23, 2021

CERTIFICATE OF COMPLIANCE

I certify that the attached **SUPPLEMENTAL RESPONDENT'S BRIEF** uses a 13 point Century Schoolbook font and contains **3,276** words.

ROB BONTA
Attorney General of California

SETH P. MCCUTCHEON
Deputy Attorney General
Attorneys for Respondent

June 23, 2021

SPM: nf
LA1997XS0004
64299813.doc

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

Case Name: People v. Karl Holmes, Herbert McClain and Lorenzo Newborn
No.: S058734

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 June 23, 2021, I electronically served the attached SUPPLEMENTAL RESPONDENT'S BRIEF 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 June 23, 2021, 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 300 South Spring Street, Suite 1702, Los Angeles, CA 90013, addressed as follows:

Michele Sussman
Central Criminal & Capital Appeals Manager
Los Angeles County Superior Court
Foltz Criminal Justice Center
210 West Temple Street Room M3
Los Angeles, CA 90012

Mark Greenberg, Attorney at Law
Served Via: True Filing

California Appellate Project (SF)
Served Via: True Filing

Debra S. Sabah Press
Attorney at Law
Served Via: True Filing
Attorney for Herbert McClain

Eric S. Multhaup, Attorney at Law
Served Via: True Filing
Attorney for Lorenzo Newborn

Karen Kelly Esq.
Served Via: True Filing
Attorney for Karl Holmes

Kathryn K. Andrews Esq.
Attorney at Law
Served Via: True Filing
Attorney for Karl Holmes

On June 23, 2021, I served the attached SUPPLEMENTAL RESPONDENT'S BRIEF by transmitting a true copy via electronic mail to:

Brian Kelberg, Deputy D.A.
Habeas Corpus Litigation Team
Capital Case Coordinator
Via Email:
BKelberg@da.lacounty.gov

Antony Meyers
Deputy District Attorney
Via Email: Courtesy Copy

Michael Hersek
Interim Executive Director
California Habeas Corpus Resource Center
Via Email: mhersek@hcrc.ca.gov

Kelli Evans
Chief Deputy Legal Affair Secretary
Governor's Office
Via Email: Courtesy Copy

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 June 23, 2021, at Los Angeles, California.

Nora Fung
Declarant

Signature

SPM: nf
LA1997XS0004
64300152.doc

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. HOLMES, McCLAIN & NEWBORN**
Case Number: **S058734**
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: **seth.mccutcheon@doj.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
SUPPLEMENTAL BRIEF	S058734 P. v. Karles Holmes, Herbert McClain & Lorenzo Newborn - Supplemental RB & DOS

Service Recipients:

Person Served	Email Address	Type	Date / Time
California California Appellate Project - Sf Joseph Schlesinger/Mordecai Garelick	filing@capsf.org	e-Serve	6/23/2021 11:14:31 AM
Eric Multhaup Court Added 62217	mullew@comcast.net	e-Serve	6/23/2021 11:14:31 AM
Kathryn Andrews Attorney at Law 104183	kathrynandrews2@comcast.net	e-Serve	6/23/2021 11:14:31 AM
Mark Greenberg Court Added 99726	markdgreen2@comcast.net	e-Serve	6/23/2021 11:14:31 AM
California California Appellate Project - Sf Joseph Schlesinger, Executive Director	docketing@capsf.org	e-Serve	6/23/2021 11:14:31 AM
Karen Kelly Attorney at Law 118105	2kkellyesq@sbcglobal.net	e-Serve	6/23/2021 11:14:31 AM
Debra Sabah Press Attorney at Law 202053	d.sabah.press@gmail.com	e-Serve	6/23/2021 11:14:31 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.

6/23/2021
Date

/s/Nora Fung

Signature

McCutcheon, Seth (278234)

Last Name, First Name (PNum)

CA Attorney General's Office - Los Angeles

Law Firm