

So'Hum Law Center Of
RICHARD JAY MOLLER
P.O. Box 1669
Redway, CA 95560-1669
(707) 923-9199

August 23, 2019

Jorge E. Navarrete
Clerk and Executive Officer of the Court
California Supreme Court
350 McAllister St.
San Francisco, CA 94102

Re: Specification Of "Focus Issues" in *People v. Rhoades*, S082101:
Oral Argument: September 3, 2019

Dear Mr. Navarrete:

Counsel for appellant, Robert Rhoades, will focus on Argument IX:

Argument IX. The Court Erred By Denying Both Of Appellant's
Wheeler/Batson Motions Without Requiring The Prosecutors To Explain
Their Reasons For Peremptorily Excusing Four African-American Women
From The Jury

Very truly yours,

//ss

RICHARD JAY MOLLER

PROOF OF SERVICE

I, RICHARD JAY MOLLER, declare that I am, and was at the time of the service hereinafter mentioned, at least 18 years of age and not a party to the above-entitled action. My business address is P.O. Box 1669, Redway, CA 95560-1669. I served the foregoing **Specification Of "Focus Issues"** on August 23, 2019, by depositing copies in the United States mail at Redway, California, with postage prepaid thereon, and addressed as follows:

Sacramento County Clerk
Superior Court
720 9th Street
Sacramento, CA 95814

Robert Boyd Rhoades
P.O. Box P-52962 -- 5EB-77
San Quentin, CA 94974

I declare under penalty of perjury that this declaration was executed on August 23, 2019, at Redway, California.

//ss
RICHARD JAY MOLLER

PROOF OF SERVICE BY ELECTRONIC SERVICE

Furthermore, I, RICHARD JAY MOLLER, declare I electronically served from my electronic service address, moller95628@gmail.com, of the **same referenced above document** on August 23, 2019, before 5:00 p.m. to the following entities:

California Department of Justice Docket Unit (SacAWTTrueFiling@doj.ca.gov)
Jennifer Poe (Jennifer.Poe@doj.ca.gov)
California Appellate Project (filing@capsf.org)

California Supreme Court (true filing)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on August 23, 2019, at Redway, California.

Ss//
RICHARD JAY MOLLER

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. RHOADES (ROBERT BOYD)**

Case Number: **S082101**

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: **moller95628@gmail.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-oral -arg

Service Recipients:

Person Served	Email Address	Type	Date / Time
Richard Moller Court Added	moller95628@gmail.com	e-Serve	8/23/2019 8:19:08 AM
Office of the Attorney General Office of the Attorney General	sacawtruefiling@doj.ca.gov	e-Serve	8/23/2019 8:19:08 AM
Jennifer Poe DOJ Sacramento/Fresno AWT Crim	jennifer.poe@doj.ca.gov	e-Serve	8/23/2019 8:19:08 AM
California Appellate Project	filing@capsf.org	e-Serve	8/23/2019 8:19:08 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.

8/23/2019

Date

/s/Richard Moller

Signature

Moller, Richard (95628)

Last Name, First Name (PNum)

So'Hum Law Center of Richard Jay Moller

Law Firm