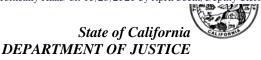
XAVIER BECERRA Attorney General



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October 23, 2020

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

RE: People v. Irving Alexander Ramirez
Supreme Court of California, Case No. S155160
Alameda County Superior Court, Case No. 151080
Focus Letter

Dear Mr. Navarrete:

This letter specifies the issues on which I expect to focus during oral argument in *People v. Ramirez*, Case No. S155160, scheduled for argument on November 3, 2020 at 1:30 p.m. As respondent's counsel, I intend to focus on the issues identified in appellant's counsel's focus letter. Appellant's counsel has advised that she will focus on Claims V and VII (as numbered in the respondent's brief).

V. The Victim Impact Evidence Was Properly Admitted

VII. The Trial Court Properly Responded to the Jury's Questions During Penalty Phase Deliberations

In addition, I will be prepared to address any matter of interest to the Court.

Respectfully submitted,

/s/ Elizabeth W. Hereford

ELIZABETH W. HEREFORD Deputy Attorney General State Bar No. 282956

For XAVIER BECERRA Attorney General

EWH:

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

Case Name: **People v. Irving Ramirez**

No.: **S155160**

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 October 23, 2020, I electronically served the attached **Respondent's Focus 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 October 23, 2020, 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 455 Golden Gate Avenue, Suite 11000, San Francisco, CA 94102-7004, addressed as follows:

The Honorable Nancy O'Malley District Attorney Alameda County District Attorney's Office [Via TrueFiling Only] Superior Court of California County of Alameda Criminal Division Rene C. Davidson Courthouse 1225 Fallon Street, Room 107 Oakland, CA 94612-4293 CAP - SF California Appellate Project (SF) 345 California Street Suite 1400 San Francisco, California 94104

Maria J. Morga Deputy State Public Defender Office of the State Public Defender Oakland City Center 111 Broadway, 10th Floor Oakland, CA 94607 (2 copies)

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 October 23, 2020, at San Francisco, California.

T Pham	/s/ T Pham
Declarant	Signature

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STATE OF CALIFORNIA

Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIASupreme Court of California

Case 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: Elizabeth.Hereford@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
LETTER	S155160 - Respondent's Focus Letter

Service Recipients:

Person Served	Email Address	Type	Date / Time
Maria Morga Office of the State Public Defender 197218	maria.morga@ospd.ca.gov	e- Serve	10/23/2020 2:37:51 PM
Liza Sabio Alameda County Superior Court Pro Per	122421200000000000000000000000000000000	e- Serve	10/23/2020 2:37:51 PM
Attorney Attorney General - San Francisco Office Elizabeth Winsor Hereford, Deputy Attorney General 282956	Elizabeth.Hereford@doj.ca.gov	1	10/23/2020 2:37:51 PM
Office Office Of The State Public Defender - Ok Evan Young, Supv. Deputy State Public Defender 000000	cscreminders@ospd.ca.gov	e- Serve	10/23/2020 2:37:51 PM
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 2:37:51 PM
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Alameda County District Attorney's Office	ACDAdocket@acgov.org	e- Serve	10/23/2020 2:37:51 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.

10/23/2020

s/Tuyen Pham	
Signature	
Hereford, Elizabeth (282956)	
Last Name, First Name (PNum)	

California Dept of Justice, Office of the Attorney General

Law Firm

Date