

RICHARD I. TARGOW

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August 30, 2021

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

Re: People v. Anthony Navarro – S165195
Oral Argument, Sept. 9, 1 p.m.
Focus Letter

Dear Mr. Navarrete:

Appellant expects to focus on the following during oral argument on September 9. The headings are from Appellant's Opening Brief.

- II. THE TRIAL COURT RULINGS WHICH EFFECTIVELY FORCED THE DEFERRAL OF THE DEFENSE OPENING ARGUMENT CONSTITUTED PREJUDICIAL ABUSES OF DISCRETION AND VIOLATED APPELLANT'S RIGHTS TO DUE PROCESS, TO COUNSEL AND TO PRESENT A DEFENSE
- III. THE TRIAL COURT'S OVERLY LITERAL INTERPRETATION OF PENAL CODE SECTION 1054.3 AND *ROLAND V. SUPERIOR* COURT RESULTED IN A VIOLATION OF APPELLANT'S CONSTITUTIONAL RIGHT TO PRESENT A DEFENSE
- VI. CUMULATIVELY, THE TRIAL COURT'S ERRORS RESULTED IN A GROSS DISTORTION OF THE FACT-FINDING PROCESS AND VIOLATIONS OF APPELLANT'S RIGHTS TO DUE PROCESS AND TO PRESENT A DEFENSE

Respectfully submitted,

RICHARD I. TARGOW
Attorney at Law

DECLARATION OF SERVICE

Re: People v. Anthony Navarro

No. S165195

I, RICHARD I. TARGOW, certify:

I am, and at all time mentioned herein was, an active member of the State Bar of California and not a party to the above-entitled cause. My business address is Post Office Box 1143, Sebastopol, California 95473.

I served a true copy of the attached FOCUS LETTER on each of the following, by TrueFiling or by placing same in an envelope or envelopes addressed, respectively, as follows:

Christine Bergman, Dep. Atty. Gen. (TrueFiling)
Office of the Attorney General
P.O. Box 85266-5299
San Diego, CA 92186-5266

Wesley Van Winkle (TrueFiling)
Alternate Assisting Attorney
P.O. Box 5216
Berkeley, CA 94705-0216

Anthony Navarro, Appellant (Mail)

For each mail recipient, each said envelope will, on August 30, 2021, be sealed and deposited in the United States Mail at Sebastopol, California, with postage fully prepaid.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 30th day of August, 2021, at Sebastopol, California.

RICHARD I. TARGOW
Attorney at Law

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. NAVARRO**
(ANTHONY)

Case Number: **S165195**

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: **rtargow@sonic.net**
3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

Filing Type	Document Title
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ADDITIONAL CITES FOR ORAL ARGUMENT	Additional Authorities Letter
LETTER	Request for 45 Minutes

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

8/30/2021

Date

/s/Richard Targow

Signature

Targow, Richard (87045)

Last Name, First Name (PNum)

Richard I. Targow, Attorney at Law

Law Firm