

RICHARD I. TARGOW

APPELLATE ATTORNEY

Post Office Box 1143  
Sebastopol, California 95473  
707 829 5190 rtargow@sonic.net

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  
Additional Authorities

Dear Mr. Navarrete:

This case is scheduled for oral argument on Thursday, September 9, 2021, at 1 p.m. For the Court’s consideration, appellant cites the following additional recent authorities, relevant to the appellate issues and not included in prior briefing.

1. People v. Valencia (2021) 11 Cal.5th 818, 489 P.3d 700, 280 Cal.Rptr. 581, relevant to appellant’s argument that gang-predicate packets were hearsay (See Appellant’s Second Supplement Brief, Argument III, at pages 23-30.)
2. Garcia v. Burton, No. 19-cv-07600-VC (N.D. Cal. Apr. 29, 2021), at pages \*58-\*59 [in order denying a petition for habeas corpus, noting the “prevailing professional view” on the importance opening statements given at the start of trial] relevant to appellant’s Argument II.
3. People v. McDaniel (S171393, Aug. 26, 2021), Concurring Opinion of Justice Liu, relevant to appellant’s argument that aggravating factors must be found beyond a reasonable doubt (AOB Argument IX.C.1) and unanimously (Argument IX.D.)

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 ADDITIONAL AUTHORITIES 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 30<sup>th</sup> day of August, 2021, at Sebastopol, California.

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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**
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ADDITIONAL CITES FOR ORAL ARGUMENT	Additional Authorities Letter
LETTER	Request for 45 Minutes

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Richard Targow Attorney at Law 87045	rtargow@sonic.net	e-Serve	8/30/2021 1:40:34 PM
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Attorney Attorney General - San Diego Office Holly Wilkens, Supervising Deputy Attorney General 88835	Holly.Wilkens@doj.ca.gov	e-Serve	8/30/2021 1:40:34 PM

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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

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Date

/s/Richard Targow

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Signature

Targow, Richard (87045)

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Last Name, First Name (PNum)

Richard I. Targow, Attorney at Law

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Law Firm