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May 14, 2020

Jorge E. Navarrete
Court Administrator & Clerk of the Court
Supreme Court of the State of California
350 McAllister Street
San Francisco, CA 94102-4797

RE: *People v. Paul Nathan Henderson*
Supreme Court of the State of California, Case No. S098318

Dear Mr. Navarrete:

This case is scheduled for oral argument on Wednesday, May 20, 2020, at 9:00 a.m. For the Court's consideration, the People cite the following additional authorities not contained in the briefs on file.

Argument V: *People v. Rhoades* (2019) 8 Cal.5th 393, 423-437; *People v. Parker* (2017) 2 Cal.5th 1184, 1212.

Argument VI: *People v. Flores* (May 4, 2020) 2020 WL2110719, at pp. *25-*33.

Argument IX: *People v. Lucas* (2014) 60 Cal.4th 153, 276-277, disapproved on another ground in *People v. Romero and Self* (2015) 62 Cal.4th 1, 53, fn. 19.

Sincerely,

S/ RONALD A. JAKOB
RONALD A. JAKOB
Deputy Attorney General

For XAVIER BECERRA
Attorney General

STATE OF CALIFORNIA
Supreme Court of California**PROOF OF SERVICE**STATE OF CALIFORNIA
Supreme Court of CaliforniaCase Name: **PEOPLE v. HENDERSON (PAUL NATHAN)**Case Number: **S098318**

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.
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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.

5/14/2020

Date

/s/Lidia Hernandez

Signature

Jakob, Ronald (131763)

Last Name, First Name (PNum)

Department of Justice, Office of the Attorney General-San Diego

Law Firm