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January 31, 2020

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

RE: *People v. Clydell Bryant*
Case No. S259956
Second District Court of Appeal No. B271300

Dear Mr. Navarrete:

The People have filed a petition for review in the above-entitled case, which is currently pending, and submit this letter to call the Court's attention to recent authority. The Second District Court of Appeal's unpublished opinion in *People v. Magana* (Jan. 27, 2020, No. B280357) 2020 WL 415576, *6, is relevant to the discussion at pages 13 through 17 of the petition.

Respectfully submitted,

/s/ Zee Rodriguez

ZEE RODRIGUEZ
Supervising Deputy Attorney General

For XAVIER BECERRA
Attorney General

ZR:zr

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. BRYANT**

Case Number: **S259956**

Lower Court Case Number: **B271300**

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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Filing Type	Document Title
LETTER	S259956_LTR_People

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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.

1/31/2020

Date

/s/Lisa Ng

Signature

Rodriguez, Zee (204357)

Last Name, First Name (PNum)

CA Attorney General's Office - Los Angeles

Law Firm