

Office of the State Public Defender

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February 17, 2021

Jorge E. Navarrete
Clerk and Executive Officer
Supreme Court of California
350 McAllister Street
San Francisco, CA 94102-3600

Re: *People v. Robert Walter Scully*
California Supreme Court Case No. S062259

Dear Mr. Navarrete:

Oral argument in the above-referenced case has been calendared for March 2, 2021, at 9:00 a.m. I intend to focus my argument on the following claims, numbered as they appear in appellant’s opening brief:

Argument I. The Trial Court Erroneously Denied Appellant’s Initial and Renewed Motions for Change of Venue Requiring Reversal of the Entire Judgment.

Argument II: The Court Prejudicially Erred When It Admitted Evidence of Other Crimes to Prove the Conspiracy and Attempted Robbery Counts.

Argument III. The Court Erred When It Failed to Dismiss Under Section 995 Two Counts on Which the Magistrate had Found Insufficient Evidence, and Prejudice Resulted Because Those Counts Were the Sole Vehicles for Introduction at the Guilt Phase of Prejudicial Evidence of Other Robberies.

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People v. Robert Walter Scully (No. S062259)
February 17, 2021
Page 2 of 2

Thank you for your attention to this matter.

Sincerely,

/S/ VALERIE HRICIGA

VALERIE HRICIGA
Supervising Deputy State Public
Defender
Office of the State Public Defender
Attorneys for Appellant

DECLARATION OF SERVICE

People v. Robert Walter Scully

Cal. Supreme Ct. No. S062259
Sonoma Co. Superior SCR-22969

I, Jon Nichols, declare as follows: I am over the age of 18, not a party to this cause. I am employed in the county where the mailing took place. My business address is 1111 Broadway, 10th Floor, Oakland, California, 94607. I served a true copy of the following document(s):

LETTER

by enclosing it in envelopes and placing the envelopes for collection and mailing with the United States Postal Service with postage fully prepaid on the date and at the place shown below following our ordinary business practices.

The envelopes were addressed and mailed on **February 17, 2021**, as follows:

Robert Scully, #C-46081
CSP-SQ
1-INF-50
San Quentin, CA 94974

The aforementioned document(s) were served electronically (via TrueFiling) to the individuals listed below on **February 17, 2021**:

Julia Y. Je
CA Attorney General's Office
455 Golden Gate Ave. Suite 1000
San Francisco, CA 94102
julia.je@doj.ca.gov

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed on **February 17, 2021**, at Alameda County, California.

/s/ Jon Nichols
JON NICHOLS

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. SCULLY (ROBERT WALTER)**

Case Number: **S062259**

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: **valerie.hriciga@ospd.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	Appellant's Focus Letter

Service Recipients:

Person Served	Email Address	Type	Date / Time
Valerie Hriciga Office of the State Public Defender 135706	valerie.hriciga@ospd.ca.gov	e-Serve	2/17/2021 11:29:55 AM
Julia Je Office of the Attorney General 192746	julia.je@doj.ca.gov	e-Serve	2/17/2021 11:29:55 AM

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.

2/17/2021

Date

/s/Jon Nichols

Signature

Hriciga, Valerie (135706)

Last Name, First Name (PNum)

Office of the State Public Defender

Law Firm