

## Office of the State Public Defender

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December 20, 2018

Mr. Jorge E. Navarrete, Clerk  
Supreme Court of California  
350 McAllister St.  
San Francisco, CA 94102-3600

**Re:** *People v. Juan Sanchez*  
Supreme Court of California Case No. S087569

Dear Mr. Navarrete:

I will be presenting oral argument in this case on behalf of appellant, Juan Sanchez, in San Francisco on the 1:30 p.m. calendar, on Tuesday, January 8, 2019. At that hearing, I intend to focus my argument on the following issues (numbered as they appear in appellant's opening brief):

- V. THE TRIAL COURT'S ERRONEOUS RESTRICTION OF APPELLANT'S RIGHT TO IMPEACH OSCAR HERNANDEZ REQUIRES REVERSAL OF THE JUDGMENT;**
- VIII. THE TRIAL COURT COMMITTED REVERSIBLE ERROR, WHEN IT PERMITTED THE PROSECUTION TO ELICIT EVIDENCE OF APPELLANT'S HOMOSEXUAL RELATIONSHIP WITH PROSECUTION WITNESS HECTOR HERNANDEZ BECAUSE ITS PREJUDICIAL EFFECT SUBSTANTIALLY OUTWEIGHED ANY PROBATIVE VALUE IT MIGHT HAVE; and**
- IX. THE CROSS-EXAMINATION AND IMPEACHMENT OF APPELLANT ABOUT HIS HOMOSEXUAL RELATIONSHIP WITH HECTOR HERNANDEZ, INCLUDING POST-INVOCATION STATEMENTS SUPPRESSED BY THE COURT, VIOLATED APPELLANT'S RIGHTS TO DUE PROCESS, A FAIR TRIAL AND HIS *MIRANDA* RIGHTS UNDER *HARRIS v. NEW YORK*.**

Mr. Jorge E. Navrette, Clerk  
December 20, 2018  
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I am requesting 45 minutes for appellant's argument.

Thank you for bringing this letter to the Court's attention.

Sincerely,

/s/ Nina Wilder

NINA WILDER  
Supervising Deputy State Public Defender

**DECLARATION OF SERVICE BY MAIL**

*People v. Juan Sanchez*

Supreme Court No. S087569  
Superior Court No. CR-40863

I, the undersigned, 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 copy of the following document(s):

**ORAL ARGUMENT FOCUS LETTER**

by enclosing it in envelopes and

/ / **depositing** the sealed envelope with the United States Postal Service with the postage fully prepaid;  
/X/ **placing** the envelopes for collection and mailing on the date and at the place shown below following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

The envelopes were addressed and mailed on **December 20, 2018**, as follows:

Juan Sanchez, #P-75273  
CSP-SQ  
5-EB-97  
San Quentin, CA 94974

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed on December 20, 2018, at Oakland, California.

/s/ Tamara Reus

\_\_\_\_\_  
TAMARA REUS

**STATE OF CALIFORNIA**  
 Supreme Court of California

**PROOF OF SERVICE**

**STATE OF CALIFORNIA**  
 Supreme Court of California

Case Name: **PEOPLE v. SANCHEZ**  
**(JUAN)**

Case Number: **S087569**

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: **nina.wilder@ospd.ca.gov**
3. I served by email a copy of the following document(s) indicated below:

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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.

12/20/2018

Date

/s/Nina Wilder

Signature

Wilder, Nina (100474)

Last Name, First Name (PNum)

Office of the State Public Defender

Law Firm