

SUPREME COURT COPY



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DEPARTMENT OF JUSTICE

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December 8, 2016

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

**SUPREME COURT
FILED**

DEC 12 2016

Jorge Navarrete Clerk

RE: *People v. Donald L. Brooks*
Supreme Court of the State of California, Case No. S099274

Deputy

Dear Mr. Navarrete:

The Court has requested that counsel advise the Court and opposing counsel of the issues on which counsel expects to focus at oral argument, calendared for January 4, 2017, at 1:30 p.m., in San Francisco. As counsel for respondent, I intend to focus on the issues raised by appellant in his statement of focus issues as well as any issues addressed by the Court at oral argument.

Respectfully submitted,

A handwritten signature in black ink that reads "Allison Chung".

ALLISON H. CHUNG
Deputy Attorney General

For KAMALA D. HARRIS
Attorney General

DEATH PENALTY

AHC:

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DECLARATION OF SERVICE

Case Name: **People v. Donald L. Brooks**

Case No.: **S099274**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter; my business address is 300 South Spring Street, Suite 1702, Los Angeles, CA 90013. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

On December 9, 2016, I served the attached **FOCUS LETTER** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the internal mail system of the Office of the Attorney General, addressed as follows:

John L. Staley, Esq.
11770 Bernardo Plaza Court, Suite 305
San Diego, CA 92128

California Appellate Project (SF)
101 Second Street, Suite 600
San Francisco, CA 94105-3647

Susan Gruber, Deputy District Attorney
Los Angeles County
District Attorney's Office
210 West Temple Street
Los Angeles, CA 90012

Addie Lovelace
Death Penalty Appeals Clerk
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210 West Temple Street, Room M-3
Los Angeles, CA 90012

Brentford Ferreira
Deputy District Attorney
Los Angeles County
District Attorney's Office
210 W. Temple Street
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On December 9, 2016, I caused the original and eight (8) copies of the **FOCUS LETTER** in this case to be delivered to the California Supreme Court at 350 McAllister St., 1st Floor, San Francisco, CA 94102 by Overnight delivery.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on December 9, 2016, at Los Angeles, California.

J. Villegas
Declarant


Signature