## **SNEDEKER, SMITH & SHORT**

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#### CAPITAL CASE

May 25, 2022

Honorable Jorge Navarette Clerk, California Supreme Court 350 McAllister Street San Francisco, CA 94102

> Re: <u>People v. Juan Villa Ramirez</u> No. S099844 Focus Issues

Dear Mr. Navarette,

Please bring to the Court's attention the following "focus issues" for the June 8, 2022, oral argument in the above-entitled case:

- 1. Argument I (errors related to failure to change venue);
- 2. Argument II, IV, V, and VI (errors related to biased jury).

Best wishes to you. If you have any questions, please call or write.

Sincerely yours,

/s/ Michael Snedeker

Attorney for Appellant JUAN VILLA RAMIREZ

### DECLARATION OF ELECTRONIC SERVICE

Re: *People v. Juan Villa Ramirez*, Cal. Supreme Court No. S099844; Kern Co. Super Ct. No. SC076259A. I, the undersigned, declare that I am over 18 years of age, and not a party to the within cause; my business address is PMB 710, 2800 NE Lombard St., Portland, Oregon 97217. My electronic service address is m.snedeker@comcast.net. On May 25, 2022, I served a true copy of the attached

#### LETTER RE FOCUS ISSUES

on each of the following, by electronic mail, addressed as follows:

Heather Hardwick: <a href="https://hhardwick@capsf.org">hhardwick@capsf.org</a>
Sean McCoy: <a href="mailto:sean.mccoy@doj.ca.gov">sean.mccoy@doj.ca.gov</a>

California Appellate Project efiling: <u>filing@capsf.org</u>

#### DECLARATION OF SERVICE BY MAIL

Re: *People v. Juan Villa Ramirez*, Cal. Supreme Court No. S099844; Kern Co. Super Ct. No. SC076259A. I, the undersigned, declare that I am over 18 years of age, and not a party to the within cause; my business address is PMB 422, 4110 SE Hawthorne Blvd., Portland, Oregon 97214. My electronic service address is <a href="mailto:m.snedeker@comcast.net">m.snedeker@comcast.net</a>. On May 25, 2022, I served a true copy of the attached

#### LETTER RE FOCUS ISSUES

on each of the following, by placing same in an envelope (or envelopes) addressed as follows:

Juan Villa Ramirez Clerk, Kern County Superior Court

T-24667 1415 Truxtun Ave.

CSP-SQ; 4 EY-16 Bakersfield, CA 93301-5215.

San Quentin, CA 94974

Each said envelope was then, on May 25, 2022, sealed and deposited in the United States mail at Portland, Oregon, Multnomah County, the county in which I am employed, with the postage thereon fully prepaid. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 25, 2022, in Portland, Oregon.

/s/		
MICHAEL R.	SNEDEKER	

Supreme Court of California Jorge E. Navarrete, Clerk and Executive Officer of the Court Electronically FILED on 5/25/2022 by April Boelk, Deputy Clerk

# STATE OF CALIFORNIA

Supreme Court of California

# PROOF OF SERVICE

# STATE OF CALIFORNIA

Supreme Court of California

Case Name: **PEOPLE v. RAMIREZ (JUAN** 

VILLA)

Case Number: **S099844** 

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: m.snedeker@comcast.net
- 3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

(-) F-F	
Filing Type	Document Title
ADDITIONAL CITES FOR ORAL ARGUMENT	letter re new authorities May 25, 2022
ADDITIONAL CITES FOR ORAL ARGUMENT	letter re focus issues, May 25, 2022

Service Recipients:

Person Served	Email Address	Type	Date / Time
Sean Mccoy	sean.mccoy@doj.ca.gov	e-	5/25/2022 5:13:06
Office of the Attorney General		Serve	PM
182516			
Attorney Attorney General - Sacramento Office	sacawttruefiling@doj.ca.gov	e-	5/25/2022 5:13:06
Court Added		Serve	PM
Lisa Short	liselshort@comcast.net	e-	5/25/2022 5:13:06
Snedeker, Smith & Short		Serve	PM
88757			
Michael Snedeker	m.snedeker@comcast.net	e-	5/25/2022 5:13:06
Snedeker, Smith and Short		Serve	PM
62842			

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.

5/25/2022	
Date	
/s/Michael Snedeker	
Signature	
Snedeker, Michael (62842)	

Last Name, First Name (PNum)

Snedeker, Smith and Short

Law Firm