

Debra S. Sabah Press
Attorney at Law
3571 Far West Boulevard
PMB 140
Austin, TX 78731
d.sabah.press@gmail.com
512.215.8964
Cell: 510.847.5933

18 May 2020

Mr. Jorge E. Navarrete
California Supreme Court
355 McAllister Street
San Francisco, CA 94102

Re: *People v. Duong*, No. S114228

Dear Mr. Navarrete:

Regarding the oral argument set in the above-referenced case set for June 2, 2020:

1. As provided in Rules of Court, rule 8.638(b), I request 30 minutes for argument.
2. I expect to focus on Claim II, at AOB:34-46, that:

**THE TRIAL COURT'S FAILURE TO SUPPRESS FRUITS
OF THE UNCONSTITUTIONAL SEIZURE AND SEARCH
OF THE FORD EXPEDITION REQUIRES REVERSAL OF
DUONG'S CONVICTIONS AND DEATH SENTENCE**

Respectfully,

Debra S. Sabah Press
Attorney for Appellant Duong

cc: DAG Jonathan Krauss
California Appellate Project (Morey Garelick)
Anh The Duong

DECLARATION OF SERVICE

Re: People v. Duong

No.S114228

I, Debra S. Sabah Press declare that I am over the age of 18, and not a party to the within cause. My business address is 3571 Far West Boulevard; PMB 140; Austin, TX 78731.

I served a true copy of the attached ORAL ARGUMENT FOCUS LETTER

On the following by Truefiling:

Attorney General – Los Angeles
Office Jonathan M. Krauss,
Deputy Attorney General
jonathan.krauss@doj.ca.gov
docketing@laawt@doj.ca.gov

Mordecai Garelick
California Appellate Project
filing@capsf.org

And on the following by United States Mail:

Anh The Duong
P.O. Box T-84491
San Quentin, CA 94974

I declare under penalty of perjury under the laws of California and the United States that the foregoing is true and correct.

Executed on May 18, 2020 at Austin, Texas.

Debra S. Sabah Press
Attorney for Appellant Duong

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. DUONG (ANH
THE)**

Case Number: **S114228**

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: **d.sabah.press@gmail.com**
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	Duong_S114228_Oral_Argument_Focus_Letter

Service Recipients:

Person Served	Email Address	Type	Date / Time
California California Appellate Project - Sf Virginia C. Lindsay, Staff Attorney	filing@capsf.org	e-Serve	5/18/2020 11:40:46 AM
Peggy Huang Office of the Attorney General	docketinglaawt@doj.ca.gov	e-Serve	5/18/2020 11:40:46 AM
Habeas Habeas Corpus Resource Center Fred Renfro, Staff Attorney	docketing@hrcr.ca.gov	e-Serve	5/18/2020 11:40:46 AM
Attorney Attorney General - Los Angeles Office Jonathan M. Krauss, Deputy Attorney General 279101	jonathan.krauss@doj.ca.gov	e-Serve	5/18/2020 11:40:46 AM
Debra Sabah Press Debra S. Sabah Press 202053	d.sabah.press@gmail.com	e-Serve	5/18/2020 11:40:46 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.

5/18/2020

Date

/s/Debra Sabah Press

Signature

Sabah Press, Debra (202053)

Last Name, First Name (PNum)

Debra S. Sabah Press

Law Firm