
Kimberly J. Grove
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February 19, 2019

Jorge E. Navarrete, Clerk and Executive Officer of the Supreme Court
April Boelk, Automatic Appeals Unit Supervisor
California Supreme Court
350 McAllister Street
San Francisco, CA 94102

Re: *People v. Scott Thomas Erskine* #S127621
Focus Letter for Oral Argument, Wednesday, March 6, 2019, 9:00 a.m.

Dear Mr. Navarrete and Ms. Boelk:

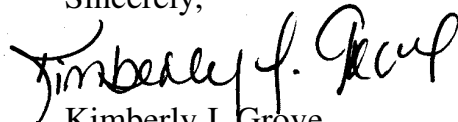
This letter is to advise the court that I will be focusing my oral argument on the following issues:

Argument II in Appellant's Opening Brief: The Trial Court's Improper Removal of Prospective Juror #154 for Cause Necessitates Reversal of the Death Penalty Judgment.

Argument V in Appellant's Opening Brief: The Trial Judge Violated Appellant's Constitutional Rights When He Instructed Jurors That They Should Reach a Verdict on Penalty "Regardless of the Consequences."

Thank you for your attention to this matter.

Sincerely,



Kimberly J. Grove
Attorney for Appellant
Scott Thomas Erskine

DECLARATION OF SERVICE

I, the undersigned, declare:

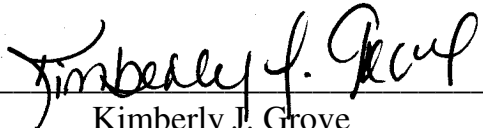
I am a citizen of the United States, over 18 years of age, employed in the county of Westmoreland, Pennsylvania, in which county the within-mentioned delivery occurred, and not a party to the subject cause. My business address is P.O. Box 425, Ligonier, Pennsylvania, and my e-mail address is kimgrove@yahoo.com. I served a true and correct copy of the Appellant's Focus Letter by placing a copy in a sealed envelope with the correct postage and depositing it in the United States mail, or by transmitting a copy electronically, to each of the following persons at the following addresses on February 19, 2019:

Robin Urbanski
Deputy Attorney General
Electronic Service
Robin.Urbanski@doj.ca.gov

Virginia C. Lindsay
California Appellate Project
Electronic Service
filing@capsf.org

Scott Thomas Erskine
P.O. Box J-16985
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. Executed on February 19, 2019, at Ligonier, Pennsylvania.



Kimberly J. Grove

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. ERSKINE (SCOTT THOMAS)**

Case Number: **S127621**

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: **kingrove@yahoo.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	S127621 Focus Letter

Service Recipients:

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eService California Appellate Project California Appellate Project 000000	filing@capsf.org	e-Service	2/19/2019 5:46:24 PM
Robin Urbanski Department of Justice, Office of the Attorney General-San Diego 228485	Robin.Urbanski@doj.ca.gov	e-Service	2/19/2019 5:46:24 PM

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.

2/19/2019

Date

/s/Kimberly Grove

Signature

Grove, Kimberly (095225)

Last Name, First Name (PNum)

Kimberly J. Grove

Law Firm