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**DEPARTMENT OF JUSTICE**

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February 18, 2021

The Honorable Jorge E. Navarrete  
Court Administrator and Clerk of the Court  
Supreme Court of California  
350 McAllister Street, First Floor  
San Francisco, California 94102-4797

RE: *People v. Robert Walter Scully*  
Supreme Court of California, Case No. S062259  
Sonoma County Superior Court, Case No. SCR22969  
Focus Letter

Dear Mr. Navarrete:

This letter specifies the issues on which I expect to focus during oral argument in *People v. Scully*, Case No. S062259, scheduled for argument on March 2, 2021, at 9:00 a.m. As respondent's counsel, I intend to focus on the issues identified in appellant's counsel's focus letter. Appellant's counsel has advised that she will focus on Claims I, II, and III, as numbered in appellant's opening brief:

- I. The Trial Court Erroneously Denied Appellant's Initial and Renewed Motions for Change of Venue Requiring Reversal of the Entire Judgment
- II. The Court Prejudicially Erred When It Admitted Evidence of Other Crimes to Prove the Conspiracy and Attempted Robbery Counts
- III. The Court Erred When It Failed to Dismiss Under Section 995 Two Counts on Which the Magistrate Had Found Insufficient Evidence, and Prejudice Resulted Because Those Counts Were the Sole Vehicles for Introduction at the Guilt Phase of Prejudicial Evidence of Other Robberies

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In addition, I will be prepared to address any matter of interest to the Court.

Sincerely,

*/s/ Julia Y. Je*

JULIA Y. JE  
Deputy Attorney General  
State Bar No. 192746

For XAVIER BECERRA  
Attorney General  
Attorneys for Respondent

SF1997XS0003

**DECLARATION OF ELECTRONIC SERVICE**  
**AND SERVICE BY U.S. MAIL**

Case Name: *People v. Robert Walter Scully*  
Case No.: *S062259*

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. I am familiar with the business practice at the Office of the Attorney General for collecting and processing electronic and physical correspondence. 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 with postage thereon fully prepaid that same day in the ordinary course of business. Correspondence that is submitted electronically is transmitted using the TrueFiling electronic filing system. Participants who are registered with TrueFiling will be served electronically. Participants in this case who are not registered with TrueFiling will receive hard copies of said correspondence through the mail via the United States Postal Service or a commercial carrier.

On February 18, 2021, I electronically served the attached **RESPONDENT'S FOCUS LETTER** by transmitting a true copy via this Court's TrueFiling system. Because one or more of the participants in this case have not registered with the Court's TrueFiling system or are unable to receive electronic correspondence, on February 18, 2021, I placed a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 455 Golden Gate Avenue, Suite 11000, San Francisco, CA 94102-7004, addressed as follows:

Valerie Hriciga Supervising Deputy State Public Defender State Public Defender's Office 1111 Broadway, Suite 1000 Oakland, CA 94607 <a href="mailto:valerie.hriciga@ospd.ca.gov">valerie.hriciga@ospd.ca.gov</a> (Via TrueFiling)	The Honorable Jill Ravitch District Attorney, Sonoma County District Attorney's Office Hall of Justice <a href="mailto:DA-Appeals@sonoma-county.org">DA-Appeals@sonoma-county.org</a> (Via TrueFiling)
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I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on February 18, 2021, at San Francisco, California.

\_\_\_\_\_  
D. Garcia  
Declarant

\_\_\_\_\_  
*/s/ D. Garcia*  
Signature

**STATE OF CALIFORNIA**  
Supreme Court of California

**PROOF OF SERVICE**

**STATE OF CALIFORNIA**  
Supreme Court of California

Case Name: **PEOPLE v. SCULLY (ROBERT WALTER)**

Case Number: **S062259**

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: **julia.je@doj.ca.gov**
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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.

2/18/2021

Date

/s/Daniel Garcia III

Signature

Je, Julia (192746)

Last Name, First Name (PNum)

California Dept of Justice, Office of the Attorney General

Law Firm