

XAVIER BECERRA
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State of California
DEPARTMENT OF JUSTICE



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January 18, 2019

Jorge E. Navarrete, Clerk and Administrator
California Supreme Court
350 McAllister Street, First Floor
San Francisco, CA 94102

RE: *People v. Michael Leon Bell*
Case No. S080056 (Automatic Appeal)

Dear Mr. Navarrete:

This case is scheduled for oral argument on February 5, 2019. In a September 19, 2018 letter to counsel, this Court had asked the parties to advise the court and opposing counsel of the issues on which counsel expects to focus his/her arguments.

Counsel for respondent has not independently identified any focus issues for argument. Instead, I will be prepared to address any focus issues specified by counsel for appellant and to answer any questions posed by the Court at oral argument.

Sincerely,

/s/ William K. Kim

WILLIAM K. KIM
Deputy Attorney General

For XAVIER BECERRA
Attorney General

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

Case Name: **People v. Bell**
No.: **S080056**

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 January 18, 2019, I electronically served the attached **LETTER TO CALIFORNIA SUPREME COURT REGARDING FOCUS ISSUES FOR ORAL ARGUMENT** 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 January 18, 2019, 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 2550 Mariposa Mall, Room 5090, Fresno, CA 93721, addressed as follows:

Gary B. Wells
Attorney at Law
9350 Hilltop Rd.
Argyle, TX 76226
Attorney for Appellant Michael Leon Bell
One (1) Courtesy Copy for Counsel's Client

County of Stanislaus
Main Courthouse, Criminal, Appeals,
Probate, Family Law & IV-D
Superior Court of California
P.O. Box 1098
Modesto, CA 95353-1098

The Honorable Birgit Fladager
District Attorney
Stanislaus County District Attorney's Office
832 12th Street, Suite 300
Modesto, CA 95354

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

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 January 18, 2019, at Fresno, California.

W. Garber

Declarant

/s/ W. Garber

Signature

STATE OF CALIFORNIA
 Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
 Supreme Court of California

Case Name: **PEOPLE v. BELL (MICHAEL LEON)**

Case Number: **S080056**

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: **William.Kim@doj.ca.gov**
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	Letter Re Focus Issues for Oral Argument

Service Recipients:

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eService California Appellate Project California Appellate Project 000000	filing@capsf.org	e-Service	1/18/2019 2:16:14 PM
Gary Wells Gary B. Wells, Attorney at Law 154954	gbwattorney@gmail.com	e-Service	1/18/2019 2:16:14 PM
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William Kim DOJ Sacramento/Fresno AWT Crim 207818	William.Kim@doj.ca.gov	e-Service	1/18/2019 2:16:14 PM

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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.

1/18/2019

Date

/s/William Kim

Signature

Kim, William (207818)

Last Name, First Name (PNum)

DOJ Sacramento/Fresno AWT Crim

Law Firm