

## Office of the State Public Defender

AJ Kutchins  
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December 30, 2021

Jorge Navarrete  
Clerk of the Supreme Court  
Supreme Court of California  
350 McAllister Street  
San Francisco, CA 94102

Re: *People v. Manuel Bracamontes* (No. S139702)

Dear Mr. Navarrete:

Oral argument in the above-referenced case has been calendared for January 12, 2022 at 10:00 a.m. I will be appearing on behalf of the appellant, Manuel Bracamontes, and intend to focus my argument on the following claims:

That Mr. Bracamontes was unjustifiably shackled in view of the jury (Argument I), and that the trial court erred in refusing to give a balanced “flight” instruction (Argument II).

Thank you for your attention to this matter.

Sincerely,

**/s/ AJ Kutchins**

AJ Kutchins  
Supervising Deputy  
State Public Defender

Counsel for Appellant  
Manuel Bracamontes

## DECLARATION OF SERVICE

*People v. Manuel Bracamontes*

Supreme Court No. S139702  
Superior Court No. SCD178329

I, the undersigned, declare as follows:

I am over the age of 18, not a party to this cause. I am employed in the county where the mailing took place. My business address is 1111 Broadway, 10th Floor, Oakland, California, 94607. I served a copy of the following document(s):

### FOCUS LETTER

by enclosing it in envelopes and

/ / **depositing** the sealed envelope with the United States Postal Service with the postage fully prepaid;

**/X/ placing** the envelopes for collection and mailing on the date and at the place shown below following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

The envelopes were addressed and mailed on **December 30, 2021** as follows:

Manuel Bracamontes, #F-06185  
CSP-Centinela  
P.O. Box 931  
Facility D: D4-214  
Imperial CA, CA 94974

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed on December 30, 2021 at Sacramento, California.

/s/ Kecia Bailey  
Kecia Bailey

**STATE OF CALIFORNIA**  
Supreme Court of California

**PROOF OF SERVICE**

**STATE OF CALIFORNIA**  
Supreme Court of California

Case Name: **PEOPLE v. BRACAMONTES**  
**(MANUEL)**

Case Number: **S139702**

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: **aj.kutchins@ospd.ca.gov**
3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

<b>Filing Type</b>	<b>Document Title</b>
LETTER	2021_12_30_Focus Letter

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Attorney Attorney General - San Diego Office Michael T. Murphy, Deputy Attorney General 178384	mike.murphy@doj.ca.gov	e-Serve	12/30/2021 12:19:25 PM
Office Office Of The State Public Defender Maria Jesus Morga, Senior Deputy State Public Defender 000000	docketing@ospd.ca.gov	e-Serve	12/30/2021 12:19:25 PM
California Appellate Project	filing@capsf.org	e-Serve	12/30/2021 12:19:25 PM
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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.

12/30/2021

Date

/s/Kecia Bailey

Signature

Kutchins, AJ (102322)

Last Name, First Name (PNum)

Office of the State Public Defender

Law Firm

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