

## Office of the State Public Defender

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February 19, 2021

Jorge E. Navarrete  
Clerk and Executive Officer of the Court  
Supreme Court of California  
350 McAllister Street  
San Francisco, CA 94102-3600

Re: *People v. Robert Walter Scully*  
California Supreme Court Case No. S062259  
**Notice of Supplemental Authorities**

Dear Mr. Navarrete:

This case is scheduled for oral argument on Tuesday, March 2, at 9:00 a.m. For this Court's consideration, appellant cites the following additional authorities not contained in the briefs on file and which counsel may cite during oral argument.

Argument I. The Trial Court Erroneously Denied Appellant's Initial and Renewed Motions for Change of Venue Requiring Reversal of the Entire Judgment.

*People v. Johnsen* (Feb. 2, 2021, S040707) \_\_Cal.5th\_\_ [2021 WL 318246]

*People v. Peterson* (2020) 10 Cal.5th 409

*People v. Anh The Duong* (2020) 10 Cal.5th 36

*People v. Rices* (2017) 4 Cal.5th 49

*People v. Smith* (2015) 61 Cal.4th 18

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People v. Robert Walter Scully (No. S062259)  
February 19, 2021  
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Thank you for bringing this letter to the Court's attention.

Sincerely,

*/s/ Valerie Hriciga*

**VALERIE HRICIGA**  
Supervising Deputy State Public  
Defender  
Office of the State Public Defender  
Attorneys for Appellant

## DECLARATION OF SERVICE BY MAIL

Re: *People v. Robert Walter Scully*

Supreme Court No. S062259  
Superior Court No. SCR22969

I, Jon Nichols, 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 true copy of the following document(s):

### LETTER

by enclosing it in envelopes and placing the envelopes for collection and mailing with the United States Postal Service with postage fully prepaid on the date and at the place shown below following our ordinary business practices.

The envelopes were addressed and mailed on **February 19, 2021**, as follows:

Julia Y. Je  
Office of the Attorney General  
455 Golden Gate Ave., Suite  
11000 San Francisco, CA 94102

Robert Scully, #C-46081  
CSP-SQ  
1-INF-50  
San Quentin, CA 94974

California Appellate Project  
101 Second St., Suite 600  
San Francisco, CA 94105

I declare under penalty of perjury that the foregoing is true and correct. Signed on **February 19, 2021**, at Alameda County, California.

/s/ Jon Nichols  
Jon Nichols

**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: **valerie.hriciga@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	Notice of Supplemental Authorities

Service Recipients:

<b>Person Served</b>	<b>Email Address</b>	<b>Type</b>	<b>Date / Time</b>
Valerie Hriciga Office of the State Public Defender 135706	valerie.hriciga@ospd.ca.gov	e-Serve	2/19/2021 3:44:20 PM
Julia Je Office of the Attorney General 192746	julia.je@doj.ca.gov	e-Serve	2/19/2021 3:44:20 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.

2/19/2021

Date

/s/Jon Nichols

Signature

Hriciga, Valerie (135706)

Last Name, First Name (PNum)

Office of the State Public Defender

Law Firm