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**State of California**  
**DEPARTMENT OF JUSTICE**

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September 24, 2021

Jorge E. Navarrete, Clerk  
Supreme Court of California  
350 McAllister Street, Room 1295  
San Francisco, CA 94102-4797

RE: ***People v. Michael Raymond Johnson***  
**California Supreme Court Case No. S070250 (Capital Case)**

Dear Mr. Navarrete:

Pursuant to this Court's Notice to Counsel Appearing for Oral Argument, counsel for respondent provides the following additional authorities that were decided after respondent's brief was filed and are not contained in any of the briefs. Two of the cases are relevant to appellant's fourth claim, which he has indicated he intends to address at oral argument—whether the trial court erroneously admitted statements appellant made to a psychiatrist working for the prosecution (AOB at 133-183, Arg. IV): *People v. Krebs* (2019) 8 Cal.5th 265; *People v. Caro* (2019) 7 Cal.5th 463. One case is relevant to appellant's seventh claim, which he also intends to address at argument—that the prosecutor repeatedly committed misconduct (AOB at 241-306, Arg. VII): *People v. Nieves* (2021) 11 Cal.4th 404.

Sincerely,

*s/Wyatt E. Bloomfield*  
WYATT E. BLOOMFIELD  
Deputy Attorney General

For ROB BONTA  
Attorney General

WEB:jw

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

Case Name: *People v. Michael Raymond Johnson*

No.:

S070250

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 September 24, 2021, I electronically served the attached NEW AUTHORITY LETTER by transmitting a true copy via this Court's TrueFiling system to:

Anthony J. Dain, Martha Zarate  
Attorneys at Law  
anthony.dain@procopio.com  
martha.zarate@procopio.com

Michael Hersek, Director  
Habeas Corpus Resource Center  
mhersek@hcrc.ca.gov

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 September 24, 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 300 South Spring Street, Suite 1702, Los Angeles, CA 90013, addressed as follows:

County of Ventura, Main Courthouse  
Superior Court of California  
Ventura Hall of Justice  
P.O. Box 6489  
Ventura, CA 93006-6489

California\_Appellate\_Project  
101 Second St., Ste. 600  
San Francisco, CA 94105

Office of the Public Defender  
County of Ventura  
800 S. Victoria Ave.  
Ventura, CA 93009

On September 24, 2021, I served the attached NEW AUTHORITY LETTER by transmitting a true copy via electronic mail using my email address Judy.Wu@doj.ca.gov to:

Maeve Fox, Deputy District Attorney  
Courtesy Copy by E-mail

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 September 24, 2021, at Los Angeles, California.

J. Wu

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*/s/ J. Wu*

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STATE OF CALIFORNIA  
Supreme Court of California**PROOF OF SERVICE**STATE OF CALIFORNIA  
Supreme Court of CaliforniaCase Name: **PEOPLE v. JOHNSON (MICHAEL  
RAYMOND)**Case Number: **S070250**

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: **wyatt.bloomfield@doj.ca.gov**
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Filing Type	Document Title
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REQUEST	S070250_REQ_People v. Johnson

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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.

9/24/2021

Date

/s/Judy Wu

Signature

Bloomfield, Wyatt (240943)

Last Name, First Name (PNum)

CA Attorney General's Office - Los Angeles

Law Firm

