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October 24, 2019

Honorable Jorge E. Navarrete
Court Administrator/Clerk of the Court
Supreme Court of California
Earl Warren Building, Civic Center Plaza
350 McAllister Street, Room 1295
San Francisco, CA 94102-4 797

Re: *People v. Ryan James Hoyt*, Case No. S113653
List of Additional Authorities

Dear Mr. Navarrete:

This Court has calendared this case for oral argument on November 5, 2019 at 1:30 p.m., in Sacramento. As counsel for appellant, I intend to cite these additional authorities not contained in the papers and briefs on file:

Claim 3. The Superior Court erred by excluding prospective juror F.G.

Additional authority: *People v. Leon* (2015) 61 Cal.4th 569.

Claim 10. The evidence was insufficient to prove the “independent purpose” element of the kidnap-murder special circumstance and instructional error permitted the jury to circumvent that defect in proof.

Additional authorities: *People v. Brooks* (2017) 3 Cal.5th 1;
Pensinger v. Chappell (9th Cir. 2015) 787 F.3d 1014.

Thank you for your kind consideration.

Sincerely,

/s/

Roger Teich
Attorney for Appellant

PEOPLE v. RYAN JAMES HOYT
Automatic Appeal No. S113653
Santa Barbara County Superior Court No. 1014465

PROOF OF SERVICE BY MAIL AND ESERVICE

I, Sabine Jordan, declare that I am over the age of 18 years and not a party to the within action. My business address is 290 Nevada Street, San Francisco, California 94110. My electronic service address is rteich@juno.com.

On October 24, 2019, I served the within **LIST OF ADDITIONAL AUTHORITIES** on the interested parties in said action by causing to be placed a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in a United States Post Office box addressed to the parties as follows:

Honorable Brian Hill, Pres. Judge
Superior Court of California
County of Santa Barbara
1100 Anacapa Street, Dept. 2
Santa Barbara, CA 93101

Mr. Ryan James Hoyt, T-84529
CSP-San Quentin, 3-EY-11
San Quentin, CA 94974
[Appellant]

I also transmitted a PDF version of this document by electronically serving the following parties via TrueFiling using the email addresses indicated:

Mr. David Glassman
Deputy Attorney General
Attorney General's Office
David.Glassman@doj.ca.gov
DocketingLAAWT@doj.ca.gov
[Respondent]

Ms. Destie Overpeck, Assistant General
Counsel, Office of General Counsel
The State Bar of California
Destie.Overpeck@calbar.ca.gov
[Counsel for the State Bar of California]

Ms. E. Anne Hawkins, Miro Cizin
Ms. Whitney Tipton
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[Appellant's Habeas Counsel]

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[Appellant's Trial Counsel]

Mr. Mark Goldrosen, Esq.
markgoldro@aol.com
[Assisting Counsel for Appellant]

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed at Mariposa, California, on October 24, 2019.

/s/ Sabine Jordan
Sabine Jordan

STATE OF CALIFORNIA

PROOF OF SERVICE

STATE OF CALIFORNIA

Case Name: **PEOPLE v. HOYT (RYAN
JAMES)**Case Number: **S113653**

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: **rteich@juno.com**
3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

Filing Type	Document Title
ADDITIONAL CITES FOR ORAL ARGUMENT	S113653-AdditionalAuthorities-Hoyt
LETTER	S113653-FocusLetterforOralArg-Hoyt

Service Recipients:

Person Served	Email Address	Type	Date / Time
Roger Teich Attorney at Law	rteich@juno.com	e-Serve	
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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.

Date

/s/Roger Teich

Signature

Teich, Roger (147076)

Last Name, First Name (PNum)

Roger I. Teich Law Office

Law Firm