

Law Offices of

JOSEPH BAXTER

SUPREME COURT COPY

CERTIFIED APPELLATE SPECIALIST

October 23, 2015

645 Fourth Street • Suite 205
Santa Rosa, California 95404
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Via Express Mail

Chief Justice Cantil-Sakauye
Supreme Court of California
350 McAllister Street
San Francisco, CA 94102-3600

SUPREME COURT
FILED

Re: *People v. Jarvis Masters*
California Supreme Court Case No. S 016883
Focus Letter Re November 3, 2013 Oral Argument

OCT 26 2015

Frank A. McGuire Clerk

Dear Chief Justice and the Justices of This Court:

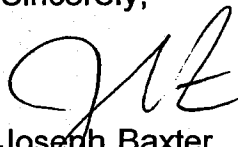
Deputy

Pursuant to the Court's July 17, 2015 letter, appellant will focus his oral argument on the first seven issues presented in Appellant's Opening Brief and the cumulative and combined impact of the errors. The principal questions that will be argued include:

1. Was Jarvis Masters denied a "meaningful opportunity to present a complete defense?" *Crane v. Kentucky* (1986) 476 U.S. 683, 690.
2. Do the Bobby Evans errors require reversal under *Brady v. Maryland* (1963) 373 U.S. 83, 87; *United States v. Bagley* (1985) 473 U.S. 667, 674-678; *Strickler v. Greene* (1999) 527 U.S. 263, 280-281; *United States v. Williams* (8 Cir. 1999) 194 F.3d 886, 889 ("winking arrangements"); *Bagley v. Lumpkin* (9 Cir. 1986) 798 F.2d 1297, 1301; and *People v. Phillips* (1985) 41 Cal.3d 29, 46?
3. What are the applicable standards of prejudice for the multitude of errors below? Were the errors prejudicial under these standards?

Appellants respectfully requests 45 minutes for argument.

Sincerely,



Joseph Baxter
Attorney at law

JB:hf
Enclosures

COPY

DEATH PENALTY

FAX 707 544-1148

PROOF OF SERVICE

I declare that:

I am a citizen of the United States and a resident of the County of Sonoma.

I am over the age of eighteen years and not a party to the within action; my business address is 645 Fourth Street, Suite 205, Santa Rosa, California, 95404.

On October 23, 2015, I served the within: **ORAL ARGUMENT FOCUS**

LETTER

on the following party(ies):

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x **BY MAIL:** I placed each such sealed envelope, with postage thereon fully prepaid for first class mail, for collection and mailing at Santa Rosa, California, following ordinary business practices. I am readily familiar with the practice of this office for the processing of correspondence, said practice being that in the ordinary course of business, correspondence is deposited with the United States Postal Service the same day as it is placed for processing.

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 on October 23, 2015, at Santa Rosa, Calif.



Ken Ward