

SNEDEKER, SMITH & SHORT

Attorneys at Law

PMB 422

4110 S.E. Hawthorne Blvd.

Portland, Oregon 97214

Tel: (503) 234-3584

Fax: (503) 232-3215

SUPREME COURT COPY

Michael R. Snedeker*
James F. Smith*
Lisa R. Short**
Lic. Daniel Solorio Ramirez
Of Counsel
Kami J. White
Certified Law Student

*Admitted in California only

**Admitted in California and Oregon

Reply to:

2626 Harrison St.
Oakland, California 94612
Tel: (510) 839-9230

P.O. Box 72451
Davis, California 95617
Tel: (530) 757-1036

Av. Electricistas no. 2033 Altos
Col. Libertad, C.P. 21030
Mexicali, Baja California
México
Tel: (52-65) 57-24-58

April 13, 2016

**SUPREME COURT
FILED**

APR 18 2016

Honorable Frank A. McGuire
Clerk, California Supreme Court
350 McAllister Street
San Francisco, CA 94102

Frank A. McGuire Clerk
Deputy

Re: People v. Louis Zaragoza
No. S97886

Dear Mr. McGuire,

Please bring to the Court's attention the following "focus issues" for the May 4, 2016, oral argument in the above-entitled case:

1. Argument II (errors related to trial court's refusal to allow appellant to call his co-defendant, the only person linked to the crime's commission by physical evidence, as a witness on his behalf);
2. Argument X (trial court's wrongful excusal of two prospective jurors).

Best wishes to you. If you have any questions, please call or write.

Sincerely yours,

Michael Snedeker
Attorney for Appellant
Louis Rangel Zaragoza

DEATH PENALTY

SNEDEKER, SMITH & SHORT

Attorneys at Law
PMB 422
4110 S.E. Hawthorne Blvd.
Portland, Oregon 97214

Tel: (503) 234-3584
Fax: (503) 232-3215

SUPREME COURT COPY

Michael R. Snedeker*
James F. Smith*
Lisa R. Short**
Lic. Daniel Solorio Ramirez
Of Counsel
Kami J. White
Certified Law Student

*Admitted in California only
**Admitted in California and Oregon

- Reply to:
- 2626 Harrison St.
Oakland, California 94612
Tel: (510) 839-9230
 - P.O. Box 72451
Davis, California 95617
Tel: (530) 757-1036
 - Av. Electricistas no. 2033 Altos
Col. Libertad, C.P. 21030
Mexicali, Baja California
México
Tel: (52-65) 57-24-58

April 13, 2016

Honorable Frank A. McGuire
Clerk, California Supreme Court
350 McAllister Street
San Francisco, CA 94102

**SUPREME COURT
FILED**

APR 18 2016

Frank A. McGuire Clerk

Deputy
Re: People v. Louis Zaragoza
No. S097886

Dear Mr. McGuire,

Please bring to the Court's attention the following cases that have been decided since briefing was completed in the above-entitled case:

1. Arguments II (errors related to trial court's refusal to allow appellant to call his co-defendant, the only person linked to the crime's commission by physical evidence, as a witness on his behalf); *Harris v. Brown* (2012) 698 F.3d 709 [reversible error to not allow defendant to subpoena material witness on grounds of incompetence] and

2. Argument X (error to peremptorily dismiss two prospective jurors who said they could follow the law); *People v. Leon* (2015) 61 Cal.4th 569, 590 [Written and oral voir dire responses of panelists did not give the court sufficient information to conclude they were incapable of performing their duties as capital jurors].

Best wishes to you. If you have any questions, please call or write.

Sincerely yours,

Michael Snedeker
Attorney for Appellant
Louis Rangel Zaragoza

DEATH PENALTY

DECLARATION OF SERVICE BY MAIL

Re: *People v. Zaragoza*, Supreme Court No. S097886

I, Michael R. Snedeker, declare that I am over 18 years of age and am not a party to this action. My business address is PMB 422, 4110 SE Hawthorne Blvd., Portland, OR 97214-5246. I served a copy of the attached:

**APPELLANT'S LETTER REGARDING FOCUS ISSUES,
APPELLANT'S LETTER CITING NEW AUTHORITIES**

on each of the following by placing same in an envelope addressed respectively as follows:

| | |
|--|---|
| Louis Rangel Zaragoza, #T-18228 CSP-SQ 2-EB-109 San Quentin, CA 94974 | Peter Smith, Deputy Attorney General 1300 I Street, Suite 125 Sacramento CA 95814 |
|--|---|

Charles Press, Staff Attorney
California Appellate Project
101 Second Street
San Francisco, CA 94105

Each said envelope was then, on April 13, 2016, sealed and deposited in the United States mail in Portland, Oregon, with postage fully prepaid.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Portland, Oregon, this 13th day of April, 2016.


MICHAEL R. SNEDEKER