

COPY

SUPREME COURT COPY

SoHum Law Center Of
RICHARD JAY MOLLER
P.O. Box 1669
Redway, CA 95560-1669
(707) 923-9199

August 5, 2016

SUPREME COURT
FILED

AUG 08 2016

Frank A. McGuire Clerk
Deputy

Frank A. McGuire, Clerk of the Court
California Supreme Court
350 McAllister St.
San Francisco, CA 94102

Re: Specification Of "Focus Issues" in *People v. Winbush*, S117489:
Oral Argument: September 8, 2016

Dear Mr. McGuire:

Counsel for appellant, Grayland Winbush, expects to focus on Arguments III and XII:

III. The Court Violated Winbush's Fifth, Sixth, And Fourteenth Amendment Due Process Rights By Denying His Challenges To Excuse Two Jurors For Cause Who Served On The Jury, While Erroneously Excusing Prospective Juror E. I. For Cause Without Permitting Adequate Voir Dire And Because Her Views Concerning The Death Penalty Would Not Have Substantially Impaired The Performance Of Her Duties; and

XII. The Court Erred In Permitting The Prosecutor To Cross-Examine Dr. Greene About Whether Winbush Fit The Criteria For Antisocial Personality Disorder, And About Whether Winbush Would Be Dangerous In The Future, Even Though She Was Not A Psychologist, And Protested It Was Outside Her Range Of Experience And Expertise, Thus Violating Winbush's Due Process Right To A Fair Penalty Hearing.

Very truly yours,


RICHARD JAY MOLLER

DEATH PENALTY

PROOF OF SERVICE

I, RICHARD JAY MOLLER, declare that I am, and was at the time of the service hereinafter mentioned, at least 18 years of age and not a party to the above-entitled action. My business address is P.O. Box 1669, Redway, CA 95560-1669. I served the foregoing **Specification Of "Focus Issues"** on August 5, 2016, by depositing copies in the United States mail at Redway, California, with postage prepaid thereon, and addressed as follows:

Karen Bovarnick
Office of the Attorney General
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102

Neoma Kenwood
California Appellate Project
101 Second Street, Suite 600
San Francisco, CA 94105

Grayland Winbush
P.O. Box V-00401
San Quentin, CA 94974

I declare under penalty of perjury that this declaration was executed on August 5, 2016, at Redway, California.



RICHARD JAY MOLLER