

STATE OF CALIFORNIA

EDMUND G. BROWN JR., *Governor*

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March 22, 2018

Mr. Jorge E. Navarrete, Clerk
Supreme Court of California
350 McAllister St.
San Francisco, CA 94102-3600

Re: *People v. People v. Mora and Rangel* (No. S079925)

Dear Mr. Navarrete:

Oral argument in the above-referenced case has been calendared for 1:30 p.m. on Wednesday, April 4, 2018. At that argument, I may cite the following authorities, which were not cited in the briefs:

1. The definition of the word trusty.¹ A “trusty” is defined as “Meriting trust; trustworthy. . . . 1. A prison inmate granted certain privileges and benefits or accorded certain duties by virtue of having been recognized as trustworthy. ¶ 2. A trusted person.” (The American Heritage Dictionary of the English Language (4th ed. 2000) p. 1851.) Black’s Law Dictionary defines a “trusty” as “A convict or prisoner who is considered trustworthy by prison authorities and therefore given special privileges.” (Black’s Law Dict. (7th ed. 2003) p. 1520, col. 2.)
2. *Roland v. Superior Court* (2004) 124 Cal.App.4th 154 [Penal Code section 1054.1’s disclosure obligation applies to oral statements in addition to written ones].

¹ At the penalty phase, defense counsel said that Mr. Mora was a module trusty from the time of his arrest until the time of his capital trial. The court reporter spelled “trusty” as “trustee,” and that spelling (“trustee” instead of “trusty”) has been used by the parties in their respective briefs. While preparing for oral argument I discovered the court reporter’s mistake and thought I would bring it to the attention of the Court and the parties.

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Thank you for bringing this letter to the Court's attention.

Sincerely,

/S/

PETER R. SILTEN
Supervising Deputy State Public Defender

DECLARATION OF SERVICE BY MAIL

People v. Joseph Mora and Ruben Rangel

Supreme Court No. S079925

I, the undersigned, declare as follows:

I am over the age of 18, not a party to this cause. I am employed in the county where the mailing took place. My business address is 1111 Broadway, 10th Floor, Oakland, California, 94607. I served a copy of the following document(s):

APPELLANT MORA'S ADDITIONAL AUTHORITIES LETTER

by enclosing it in envelopes and

/ / **depositing** the sealed envelope with the United States Postal Service with the postage fully prepaid;
/X/ **placing** the envelopes for collection and mailing on the date and at the place shown below following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

The envelopes were addressed and mailed on **March 22, 2018**, as follows:

Joseph Adam Mora, #P-43301
CSP-SQ
2-D-35
San Quentin, CA 94974

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed on March 22, 2018, at Oakland, California.

/s/ Tamara Reus

TAMARA REUS

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. MORA (JOSEPH) & RANGEL (RUBEN)**

Case Number: **S079925**

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: **nina.wilder@ospd.ca.gov**
3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

Filing Type	Document Title
LETTER	Appellant Moras Additional Authorities Letter

Service Recipients:

Person Served	Email Address	Type	Date / Time
eService California Appellate Project California Appellate Project 000000	filing@capsf.org	e-Service	3/22/2018 9:47:50 AM
John Yang Office of the Attorney General 192938	john.yang@doj.ca.gov	e-Service	3/22/2018 9:47:50 AM
John Yang CA Attorney General's Office - Los Angeles 192938	john.yang@doj.ca.gov	e-Service	3/22/2018 9:47:50 AM
LAAWT Docketing CA Attorney General's Office - Los Angeles	DocketingLAAWT@doj.ca.gov	e-Service	3/22/2018 9:47:50 AM
Michael Satris Attorney at Law 67413	satris@sbcglobal.net	e-Service	3/22/2018 9:47:50 AM
Tara Hoveland Law Office of Tara K. Hoveland 167746	tarahoveland@gmail.com	e-Service	3/22/2018 9:47:50 AM

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/Nina Wilder

Signature

Wilder, Nina (100474)

Last Name, First Name (PNum)

Office of the State Public Defender

Law Firm