

RICHARD I. TARGOW

APPELLATE ATTORNEY

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SUPREME COURT COPY

April 13, 2016

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

**SUPREME COURT
FILED**

APR 15 2016

Frank A. McGuire Clerk

Deputy

Re: *People v. Bailey Jackson* - S139103
Oral Argument, Focus Issues

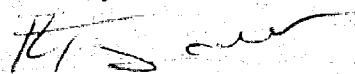
Dear Mr. McGuire:

Enclosed is the Appearance Sheet for oral argument in the above-captioned case. The further purpose of this letter is to inform the court of the issues I intend to focus on in the oral argument in this case, set for Thursday, May 5, at 1:30 p.m.

1. The failure to sever the trial on the Myers charges from the Mason charges, and in particular the issues set forth in the Court's Order for Supplemental Briefing. (AOB ARG I.)
2. The failure to exclude the dog-scent identification evidence (ARGS II and III) and the insufficiency of CALJIC No. 2.16 in cases of dog-scent identification (ARG III.D.1)
3. The admission of appellant's statements to the police after he sought to end the interview, in derogation of his right to remain silent. (ARG IV)

I am by e-mail sending a copy of this letter to respondent's counsel concurrent with the e-mail of it to the Court, followed by hard copies.

Sincerely,



RICHARD I. TARGOW
Attorney at Law

RECEIVED

APR 15 2016

DEATH PENALTY

CLERK SUPREME COURT

DECLARATION OF SERVICE BY MAIL

Re: People v. Bailey Lamar Jackson

No. S139103

I, RICHARD I. TARGOW, certify:

I am, and at all time mentioned herein was, an active member of the State Bar of California and not a party to the above-entitled cause. My business address is Post Office Box 1143, Sebastopol, California 95473.


I served a true copy of the attached LETTER TO COURT RE: FOCUS ISSUES FOR ORAL ARGUMENT on each of the following, by placing same in an envelope or envelopes addressed, respectively, as follows:

Tami F. Hennick, Dep. Atty. Gen.
Office of the Attorney General
P.O. Box 85266-5299
San Diego, CA 92186-5266

Valerie Hriciga, Staff Attorney
c/o CAP Docketing Clerk
California Appellate Project
101 2nd Street, Suite 600
San Francisco, CA 94105

Bailey L. Jackson, Jr. (Appellant)

Each said envelope was then, on April 13, 2016, sealed and deposited in the United States Mail at Sebastopol, California, with postage fully prepaid. I declare under penalty of perjury that the foregoing is true and correct. Executed this 13th day of April, 2016.



RICHARD I. TARGOW
Attorney at Law