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May 8, 2022

Jorge E. Navarrete
Clerk and Executive Officer
Supreme Court of California
Earl Warren Building
350 McAllister Street
San Francisco, CA 94102

re: People v. Christopher Strong
Supreme Court No. S266606

Dear Mr. Navarrete:

I authored one of three amicus curiae briefs filed in the above-referenced matter, and I am writing to join in amicus curiae Office of the State Public Defender (OSPD)'s request for oral argument.

I am aware that, under rule 8.524(g) of the California Rules of Court, amicus curiae are not entitled to argument time but may ask a party for permission to use part of that party's time. But in this case, although all three amici filed briefs in support of appellant, appellant's counsel has filed a brief *opposing* amici's arguments and letters opposing amici's participation in oral argument. It therefore appears that amici will not be able to participate in oral argument unless granted permission to do so by the Court.

By my reading, the three amicus curiae briefs are substantially united in their arguments (specifically, the view that the resolution of this case turns on the proper application of the doctrine of issue preclusion). Because these arguments go to the crux of the issue on review, amici's participation at oral argument seems likely to be valuable to the Court in deciding this case.

Conversely, appellant's opposition to amici's arguments gives rise to the concern that amici's absence from oral argument may leave the Court without any party adequately prepared or motivated to present a rigorous defense of amici's arguments.

I recognize that, if the Court grants amicus curiae OSPD's request, it may also decide to limit amici's participation to a single lawyer, and I would be pleased to defer to the Court and to counsel for the other two amici on such matters.

Respectfully submitted,

Jonathan E. Demson
Attorney at Law

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. STRONG**

Case Number: **S266606**

Lower Court Case Number: **C091162**

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5/8/2022

Date

/s/Jonathan Demson

Signature

Demson, Jonathan (167758)

Last Name, First Name (PNum)

Jonathan E. Demson, Attorney at Law

Law Firm