

RICHARD I. TARGOW

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SUPREME COURT COPY

April 22, 2016

SUPREME COURT
FILED

APR 25 2016

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

Frank A. McGuire Clerk

Deputy

5139103

Re: *People v. Bailey Jackson*, No. ~~S193103~~
Additional Authorities

Dear Mr. McGuire:

In addition to the new authorities cited in Appellant's Second Supplemental Brief, dated and mailed April 21, 2016, please bring to the Court's attention the following case, relevant to two arguments in appellant opening brief, for its consideration in deciding the above-entitled case:

Arguments VIII(B) and XVIII(B) (re: defense counsel's failure to object to prosecutor's misconduct in closing argument was ineffective assistance of counsel): *Zapata v. Vasquez* (9th Cir. 2015) 788 F.3d 1106, 1115-1116 [defense counsel's failure to object to prosecutor's egregious misconduct in closing argument was ineffective assistance of counsel and prejudicial].

Thank you very much.

Sincerely,



RICHARD I. TARGOW
Attorney at Law

Attorney for Appellant

DEATH PENALTY

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 ADDITIONAL AUTHORITIES LETTER 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

Hon. Patrick F. Magers,
c/o Clerk of the Superior Court
P.O. Box 431,
Riverside, CA 92501

Bailey Jackson, Appellant

Each said envelope was then, on April 22, 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 22nd day of April, 2016, at Sebastopol, California



RICHARD I. TARGOW
Attorney at Law