
Office of the State Public Defender

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October 21, 2022

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

Re: *People v. Billy Ray Waldon*, Also Known As NI Sequoyah, S025520

Dear Mr. Navarrete,

I will be presenting oral argument in this case on behalf of appellant on Wednesday, November 2, 2022, at 1:30 p.m. I intend to focus my argument on the following issues (numbered as they appear in Appellant's Opening Brief):

- VII.D. Addressing the *Faretta* motion without first appointing counsel violated appellant's right to counsel under *Cronic* and the Sixth Amendment.**

- XV. Judge Gill erred in failing to suspend proceedings because there was substantial doubt about appellant's competence to stand trial.**

I have requested 45 minutes for appellant's argument.

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

Respectfully submitted,

/s/ Hassan Gorguinpour
Hassan Gorguinpour
Supervising Deputy State Public Defender

DECLARATION OF SERVICE

Case Name: ***People v. Billy Ray Waldon a.k.a. NI Sequoyah***
Case Number: **Supreme Court Case No. S025520**
San Diego County Superior Court Case No. CR82986

I, Ana Boyea, declare as follows: I am over the age of 18, and not party to this cause. I am employed in the county where the mailing took place. My business address is 770 L Street, Suite 1000, Sacramento, California 95814. I served a true copy of the following document:

FOCUS LETTER DATED OCTOBER 21, 2022

by enclosing it in envelopes and placing the envelopes for collection and mailing with the United States Postal Service with postage fully prepaid 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 **October 21, 2022**, as follows:

Billy Ray Waldon a.k.a. N.I. Sequoyah CDCR #H-27800 CSP-SQ 5-EB-81 San Quentin, CA 94974	David M. Gill, Judge San Diego Superior Court Central Courthouse 1100 Union Street, 22nd Floor Dept. 2204 San Diego, CA 92101
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The following were served the aforementioned document(s) electronically via TrueFiling on **October 21, 2022**:

Attorney General – San Diego Elizabeth A. Hartwig Deputy Attorney General P.O. Box 85266 San Diego, CA 92186-5266 <i>sdag.docketing@doj.ca.gov</i>	Attorney General – San Diego Collette C. Cavalier Deputy Attorney General P.O. Box 85266 San Diego, CA 92186-5266 <i>Collette.Cavalier@doj.ca.gov</i>
Attorney General – San Diego <i>sdag.docketing@doj.ca.gov</i>	California Appellate Project 345 California Street San Francisco, CA 94104 <i>filing@capsf.org</i>

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed on **October 21, 2022**, at Sacramento County, California.

Ana Boyea
Digitally signed by Ana Boyea
Date: 2022.10.21 15:36:35 -07'00'

Ana Boyea

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. WALDON (BILLY RAY)**

Case Number: **S025520**

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: **hassan.gorguinpour@ospd.ca.gov**
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

10/21/2022

Date

/s/Ana Boyea

Signature

Gorguinpour, Hassan (230401)

Last Name, First Name (PNum)

Office of the State Public Defender

