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January 18, 2019

April Boelk
Automatic Appeals Unit Supervisor
Jorge E. Navarrete
Clerk and Executive Officer of the Court
Supreme Court of California

Re: Oral Argument People v. Michael Leon Bell, S080056

Dear Ms. Boelk and Mr. Navarrete:

On January 16, 2019, I was notified that oral argument in the Bell case has been placed on the Supreme Court's oral argument calendar for February 5, 2019.

The Court has requested that counsel return an appearance sheet designating the names of all attorneys who will present argument for Mr. Bell at oral argument, and the amount of time requested.

Attached to this letter is a copy of the Appearance Sheet.

In earlier correspondence, the Court requested counsel to send a letter identifying those issues on which counsel expects to focus argument

Oral argument for the appellant will be focused on:

Argument VIII: Allowing repeated playing of a videotape and audiotape of the robbery, including audio of the victim dying, was an abuse of discretion, denied appellant's right to fundamentally fair guilt and penalty phase trials, and violated the Eighth Amendment's guarantee of accuracy and reliability in capital sentencing.

Argument XIV: Mr. Bell was denied the right to due process, a fair trial, the right to confront and cross-examine witnesses against him, and a reliable adjudication of penalty, by the trial court's denial of a motion for mistrial after appellant was restrained by deputies.

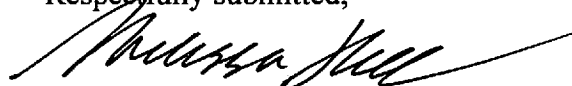
Argument XV: The trial court's failure to conduct adequate questioning of the jury to rule out the prejudicial effect of the incident in the courtroom denied appellant's right to an impartial jury and a reliable determination of the death penalty based on evidence presented in court.

Argument XVI: The lack of a clear admonition or instruction directing jurors not to consider their personal experiences of the incident in the courtroom in adjudicating whether Bell committed violent criminal conduct usable as aggravating evidence violated appellant's right to due process, a fair trial, to confrontation, and a reliable death penalty determination.

Arguments XIV, XV and XVI are based on interrelated facts set forth in Section Six of the Appellant's Opening Brief, on pages 279-295.

If the Court has any further questions or requests, please do not hesitate to contact me by email or telephone.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Melissa Hill", with a long horizontal flourish extending to the right.

Melissa Hill

PROOF OF SERVICE

I reside in the State of New Mexico, Sandoval County. I am over the age of 18 years and a duly-licensed California attorney. I represent Michael Leon Bell, the appellant in this action. My business address is PO Box 2758, Corrales, New Mexico, 87048.

On January 18, 2019, I served the attached "Appearance Sheet" and letter re focus issues for oral argument on the following interested parties by placing true copies thereof, enclosed in a sealed envelope with postage prepaid, in the United States mail in Corrales, New Mexico, addressed as follows:

Michael Leon Bell
P45400
CSP-SQ
San Quentin, CA 94974

The following parties have been served through Truefiling:

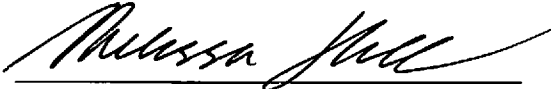
Scott Kauffman, California Appellate Project
skuffman@capsf.org

William Kim, Deputy Attorney General
William.Kim@doj.ca.gov

Gary Wells (habeas corpus counsel)
gbwattorney@comcast.net

I declare under penalty of perjury the laws of the State of California that this statement is true.

Executed this 18th of January, 2019, at Corrales, New Mexico.


Melissa Hill

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. BELL (MICHAEL LEON)**

Case Number: **S080056**

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: **hill71218@gmail.com**
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	S080056Oral Argument DocumentsBell

Service Recipients:

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Gary Wells Attorney at Law 154954	gbwattorney@comcast.net	e-Service	1/18/2019 2:33:32 PM
Melissa Hill Attorney at Law 71218	mhcorrals@me.com	e-Service	1/18/2019 2:33:32 PM
Melissa Hill Melissa Hill, Attorney 71218	hill71218@gmail.com	e-Service	1/18/2019 2:33:32 PM
Scott Kauffman Additional Service Recipients	skauffman@capsf.org	e-Service	1/18/2019 2:33:32 PM

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.

1/18/2019

Date

/s/Melissa Hill

Signature

Hill, Melissa (71218)

Last Name, First Name (PNum)

Melissa Hill, Attorney

Law Firm
