SUPREME COURT COPY

Richard P. Siref Attorney at Law State Bar No. 89079 250 E. Main Street, 8th Floor El Cajon, California 92020-3941 (619) 441-6639 Fax (619) 4414846



March 11, 2014

SUPREME COURT FILED

Frank A. McGuire Court Administrator and Clerk of the Court California Supreme Court 350 McAllister Street San Francisco, C 94102

MAR 1 3 2014

Frank A. McGuire Clerk

Deputy

Re:

People v. Donald Debose, Los Ángeles Superior Court No. YA035529;

CSC No. S080837/

Dear Mr. McGuire:

The purpose of this letter is to advise the Court of appellant's focus issues and to request 45 minutes for argument, 30 minutes for opening argument and 15 minutes for rebuttal.

Appellant will focus on the following issues: 1) the trial court committed prejudicial error when it dismissed juror number two; 2) the trial court committed prejudicial error by allowing Willard Lewis to testify that he heard co-defendant at the scene identify appellant by name; 3) the trial court erred by insisting on further deliberations and refusing to declare a mistrial when the jury declared that it was hopelessly deadlocked.

Although I am uncertain at this time whether the entire 45 minutes will be required (moot court is to be held 03/21/14 and I will have a better idea of total time needed, appellant requests the full 45 minutes permitted for argument; split 30 minutes for his opening argument and 15 minutes for rebuttal.

Sincerely, Richard P. Siref

Attorney at Law

DEATH PENALTY

DECLARATION OF SERVICE BY MAIL

RICHARD PAUL SIREF Attorney at Law State Bar No. 89079 250 E. Main Street, 8th Floor El Cajon, CA 92020-3941 (619) 974-441-6639 Fax (619) 441-4846 CASE NUMBER: S080837 (Los Angeles Superior Court No. YA035529.)

DECLARATION OF SERVICE

I, the undersigned, say: I am a citizen of the United States, over 18 years of age, employed in the County of San Diego, California, in which county the within-mentioned delivery occurred, and not a party to the subject cause. My business address is 250 E. Main Street, 8th Floor, El Cajon, CA 92020-3941. I served the <u>APPELLANT'S REGARDING ORAL ARGUMENT</u> of which a true and correct copy of the document filed in the cause is affixed, by placing a copy thereof in a separate envelope for each addressee named hereafter, addressed to each such addressee respectfully as follows:

California
Attorney General
300 South Spring Street
North Tower, Suite 5001
Los Ángeles, CA 90013
ATTN: David A. Wildman

California Appellate Project 101 Second Street Suite 600 San Francisco, CA 94105

Donald Debose P.O. Box P-48000 San Quentin, CA 94974

Each envelope was then sealed and with the postage thereon fully prepared deposited in the United States mail by me at San Diego, California, on March 11, 2014.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 11, 2014 at San Diego, California.

RICHARD P. SIREF