

**PATRICK MORGAN FORD**

**Attorney at Law**

1901 First Avenue, Suite 400  
San Diego, CA 92101 • 619-236-0679

August 18, 2020

Larry Blake, Jr.  
Senior Deputy Clerk  
California Supreme Court  
350 McAllister Street  
San Francisco, CA 94102-4783

Re: Focus letter in *People v. Flinner* — (S123813)

Dear Mr. Blake:

Oral argument in Mr. Finner's case has been scheduled for Wednesday, September 2nd, 2020 at 9:00 a.m. I will be arguing the case remotely.

I plan to argue the first issue listed in the briefs dealing with the restrictions on appellant's access to counsel made after secret meetings between the prosecution, the court and the sheriff's department, and without a hearing allowing the defense to challenge the restrictions.

I also intend to argue that a juror committed misconduct resulting in an implied bias where she took steps during trial to write a book about the case. That argument is listed in the briefs as number XV, although it was mistakenly omitted from the topical index. I apologize for any inconvenience caused by the mistake. The argument begins on page 182 of appellant's opening brief.

Sincerely,



Patrick Morgan Ford

DECLARATION OF SERVICE BY U.S. MAIL

I, Esther F. Rowe, say: I am a citizen of the United States, over 18 years of age, and employed in the County of San Diego, California, in which county the within-mentioned delivery occurred, and not a party to the subject case. My business address is 1901 First Avenue, Suite 400, San Diego, CA 92101. On August 18, 2020, I served an *Focus Letter For Oral Argument*, of which a true and correct copy of the document filed in the case is affixed, by placing a copy thereof in a separate envelope for each addressee respectively as follows:

Michael Flinner, V-30064  
S.Q.S.P.  
San Quentin, CA 94964

Additionally, I electronically served a copy of the above document as follows: 1) Court of Appeal, [www.truefiling.com](http://www.truefiling.com), and 2) Attorney General electronic notification address, [sdag.docketing@doj.ca.gov](mailto:sdag.docketing@doj.ca.gov), 3) Attorney General San Diego, Holly Wilkens e-serve, [Holly.Wilkens@doj.ca.gov](mailto:Holly.Wilkens@doj.ca.gov), 4) Christopher Beesley e-serve, [Christopher.Beesley@doj.ca.gov](mailto:Christopher.Beesley@doj.ca.gov) I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 18, 2020, at San Diego, California.



Esther F. Rowe

**STATE OF CALIFORNIA**  
Supreme Court of California

**PROOF OF SERVICE**

**STATE OF CALIFORNIA**  
Supreme Court of California

Case Name: **PEOPLE v. FLINNER (MICHAEL WILLIAM)**

Case Number: **S123813**

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: **ljlegal@sbcglobal.net**
3. I served by email a copy of the following document(s) indicated below:

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ADDITIONAL DOCUMENTS	Flinner(S123813) Focus letter.pdf

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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.

8/18/2020

Date

/s/Patrick Ford

Signature

Ford, Patrick (114398)

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Last Name, First Name (PNum)

Law Office of Patrick Morgan Ford

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Law Firm