Supreme Court of California
Jorge E. Navarrete, Clerk and Executive Officer of the Court
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LAW OFFICES

Supreme Court of California
Jorge E. Navarrete, Clerk and Executive Officer of the Court
Electronically FILED on 3/22/2024 by LaNae Brooks, Deputy Clerk

PUBLIC DEFENDER

ORANGE COUNTY PUBLIC DEFENDER

CHARLES E. HASSE
ACTING SENIOR ASSISTANT PUBLIC DEFENDER

TRACY R. LESAGE
SENIOR ASSISTANT PUBLIC DEFENDER

SARA C. NAKADA
SENIOR ASSISTANT PUBLIC DEFENDER

LAURA J. JOSE
CHIEF DEPUTY PUBLIC DEFENDER

801 Civic Center Drive West, Suite 400
SANTA ANA, CA 92701-4026
(657) 251-6090 FAX: (714) 479-0825
www.pubdef.ocgov.com

March 22, 2024

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

Re: S276395—*Needham (Nicholas) v. Superior Court of Orange County (People);* Additional Authority (Cal. Rules of Court, rule 8.254)

To the Clerk of the Court:

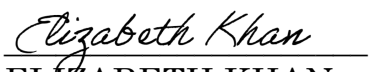
Petitioner brings this Court's attention to additional new authority relevant to the issues raised in this petition. This case was fully briefed on April 4, 2023, when the People filed their reply.[1] The following authority was decided after that date.

People v. Sloan (2023) 93 Cal.App.5th 698 (rev. granted September 20, 2023, deferred pending consideration and disposition of a related issue in this case, *Needham v. Suprior Court* S276395), decided July 17, 2023.

[1] We note that the People made a factual assertion in their reply brief, without citation to the record, that Mr. Needham has not received sex offender treatment while confined at the Orange County Jail. (Reply Brief, pp. 9-10.) On the contrary, Mr. Needham has received sex offender treatment at the Orange County Jail, as referenced in the evaluations, including the evaluation of the People's expert, Dr. Craig King. We believe this was inadvertent error on the People's part and not an attempt to mislead the Court.

Respectfully,

MARTIN F. SCHWARZ
Orange County Public Defender



ELIZABETH KHAN
Deputy Public Defender
Attorneys for Petitioner

DECLARATION OF SERVICE

Needham (Nicholas) v. Superior Court of Orange County (People)—S276395

STATE OF CALIFORNIA)
) ss
COUNTY OF ORANGE)

I, Joseph Arrocha, declare that I am a citizen of the United States, a resident of Orange County, over the age of 18 years, not a party to the above-entitled action and has a business address at 801 Civic Center Drive West, Suite 400, Santa Ana, California 92701.

That on the 22nd day of March, 2024, I served a copy of the LETTER OF ADDITIONAL AUTHORITY, in the above-entitled action, by depositing a copy thereof in a sealed envelope, postage thereon fully-prepaid, in the United States Mail at Santa Ana, California, addressed to the parties at the address listed below.

Deputy County Clerk
Attn: Hon. Elizabeth Macias
Orange County Superior Court
Central Justice Center Dr.
700 Civic Center
Santa Ana, CA 92701

Orange County District
Attorney
Attn: Yvette Patko
300 N. Flower Street
Santa Ana, CA 92703
Yvette.patko@ocdapa.org

Attorney General
P.O. Box 85266-5299
San Diego, CA 92186-5266

Executed on this 22nd day of March, 2024, at Santa Ana, California.

Joseph Arrocha
Joseph Arrocha

Supreme Court of California
Jorge E. Navarrete, Clerk and Executive Officer of the Court
Electronically FILED on 3/22/2024 by LaNae Brooks, Deputy Clerk

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **NEEDHAM v. S.C. (PEOPLE)**
Case Number: **S276395**
Lower Court Case Number: **G060670**

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: **elizabeth.khan@pubdef.ocgov.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	Additional Authority - Needham

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Elizabeth Khan Orange County Public Defender 292041	elizabeth.khan@pubdef.ocgov.com	e-Serve	3/22/2024 4:14:42 PM
Yvette Patko Office of the District Attorney 161892	yvette.patko@ocdapa.org	e-Serve	3/22/2024 4:14:42 PM
Joseph Arrocha	Joseph.arrocha@ocpubdef.com	e-Serve	3/22/2024 4:14:42 PM
ELIZABETH MCALONEY ORANGE COUNTY PUBLIC DEFENDER	elizabeth.mcaloney@pubdef.ocgov.com	e-Serve	3/22/2024 4:14:42 PM
Adam Vining Orange County Public Defender 233702	adam.vining@pubdef.ocgov.com	e-Serve	3/22/2024 4:14:42 PM
Samantha Ariston County of Orange Public Defender's Office	Samantha.Ariston@ocpubdef.com	e-Serve	3/22/2024 4:14:42 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.

3/22/2024
Date

/s/Joseph Arrocha

Signature

Khan, Elizabeth (292041)

Last Name, First Name (PNum)

Orange County Public Defender

Law Firm