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January 16, 2018

Jorge E. Navarrete, Clerk
California Supreme Court
350 McAllister Street
San Francisco, CA 94102

RE: People v. Ennis Reed (Death Penalty); Case No. S082776

Dear Mr. Navarrete:

The Court has requested that counsel advise the Court and opposing counsel of the issues on which counsel expects to focus at oral argument, calendared for February 6, 2018, at 1:30 p.m., in Sacramento.

As counsel for appellant, I intend to focus on two issues:

Argument I in the AOB: By refusing to grant appellant's motion to continue the trial to allow witness Joe Galindo to testify, the trial court unreasonably restricted appellant's ability to present his defense in violation of appellant's Sixth Amendment right to the effective assistance of counsel, and to present a defense, and precluded a fair and reasonable trial required by due process and the Eighth Amendment.

Argument IV in the AOB: Appellant established a prima facie claim of racial discrimination during voir dire of the guilt phase jury, entitling him to a reversal.

Yours very truly,



GAIL HARPER

GH/gh

DECLARATION OF ELECTRONIC SERVICE

I am employed in the county of San Francisco, California; I am over the age of eighteen years and not a party of the within entitled cause; my business address is P. O. Box 330057, San Francisco, CA 94133.

Correspondence that is submitted electronically is transmitted using the TrueFiling electronic filing system. Participants who are registered with TrueFiling will be served electronically. Participants in this case who are not registered with TrueFiling will receive hard copies of said correspondence through the mail via the United States Postal Service or a commercial carrier.

On January 16, 2018, I electronically served the attached FOCUS LETTER RE: ORAL ARGUMENT by transmitting a true copy via this Court's TrueFiling system to:

William H. Shin
Deputy Attorney General
William.Shin@doj.ca.gov

Scott Kauffman, Esq.
CAP SF
SKauffman@capsf.org

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on January 16, 2018, at San Francisco, California.



GAIL HARPER

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. REED
(ENNIS)**

Case Number: **S082776**

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: **crimlaw5@gmail.com**
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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.

--

Date

/s/Gail Harper

Signature

Harper, Gail (104510)

Last Name, First Name (PNum)

Gail Harper, Attorney at Law

Law Firm

