

KATHRYN K. ANDREWS

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February 16, 2022

California Supreme Court
350 McAllister Street
Room 1295
San Francisco, CA 94102

Re: *People v. Calvin Lamont Parker* -- CAPITAL CASE
Statement of Focus Issues for Oral Argument

Dear Chief Justice Cantil-Sakauye, and the Honorable Associate Justices of the California Supreme Court:

I will be appearing as the only counsel for Appellant Calvin Lamont Parker. Parker at his oral argument, scheduled for 1:30 p.m. on March 1, 2022. This letter is to inform the Court and opposing counsel that I intend to focus on the following arguments in the Appellant's Opening Brief.

1. THE TRIAL COURT ERRED IN FAILING TO DECLARE A DOUBT AS TO APPELLANT'S COMPETENCE TO STAND TRIAL.
2. THE TRIAL COURT ERRED IN ADMITTING INFLAMMATORY IMAGES PROTECTED BY THE FIRST AMENDMENT, AND PERMITTING THE PROSECUTION TO INFECT THE ENTIRE TRIAL WITH THE SPECTER OF ALLEGED "PORNOGRAPHY" THAT WAS

NEITHER OBSCENE NOR RELEVANT TO THE DEFENDANT'S
GUILT OR INNOCENCE OF THE ALLEGATIONS

3. THE TRIAL COURT ERRED IN PERMITTING A DENTIST TO
TESTIFY AS A "TOOL MARK" EXPERT REGARDING ALLEGED
HANDCUFF MARKS ON THE VICTIM'S BACK (MARKS NOT
CONSIDERED SIGNIFICANT BY THE FORENSIC PATHOLOGIST),
AND IN PERMITTING A THOROUGHLY UNRELIABLE "RE-
ENACTMENT" USING THE VICTIM'S BODY AND A RANDOM PAIR
OF HANDCUFFS FROM THE EVIDENCE ROOM.

I am requesting 45 minutes of argument, reserving 5 minutes for rebuttal.

Sincerely,

/s/ _____
Kathryn K. Andrews
Counsel for
CALVIN LAMONT PARKER

PROOF OF SERVICE by mail and e-service

I, Kathryn K. Andrews, declare that I am over the age of 18 years, and not a party to this action. My business address is 3060 El Cerrito Plaza, PMB 356, El Cerrito, CA 94530. My electronic service address is kathrynandrews2@comcast.net.

On February 16, 2022, I served the enclosed **Statement of Focus Issues for Oral Argument** on my client by placing it in a US Postal Service mailbox as follows:

Calvin Lamont Parker
PO Box T-83123
San Quentin State Prison, One Main St.
San Quentin, CA 94974

I also served the Court and the following parties electronically, via TrueFiling, using the email contacts provided:

Supreme Court of California

Kristen Ramirez, Deputy Attorney General

The California Appellate Project

Docketing at the DOJ

Docketing at CAP

The Habeas Corpus Resource Center

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on February 16, 2022, in El Cerrito, California.

/s/ _____
Kathryn K. Andrews
Counsel for
CALVIN LAMONT PARKER

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. PARKER (CALVIN LAMONT)**

Case Number: **S113962**

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: **kathryndrews2@comcast.net**
3. I served by email a copy of the following document(s) indicated below:

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| Quisteen Shum Office of the Attorney General 174299 | Quisteen.Shum@doj.ca.gov | e-Serve | 2/16/2022 9:34:30 AM |
| Attorney Attorney General - San Diego Office Holly Wilkens, Supervising Deputy Attorney General 88835 | Holly.Wilkens@doj.ca.gov | e-Serve | 2/16/2022 9:34:30 AM |

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.

2/16/2022

Date

/s/Kathryn Andrews

Signature

Andrews, Kathryn (104183)

Last Name, First Name (PNum)

Kathryn K. Andrews

Law Firm