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State of California
DEPARTMENT OF JUSTICE



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March 21, 2023

The Honorable Jorge E. Navarrete
Clerk/Executive Officer
Supreme Court of California
350 McAllister Street
San Francisco, CA 94102-4797

RE: *People v. Catarino*, California Supreme Court, Case No. S271828
Fourth Appellate District, Division One, Case No. D078832
Santa Clara County Superior Court, Case No. C1635441

Dear Mr. Navarrete:

Pursuant to this Court's notice to counsel issued March 15, 2023, I wish to inform the Court of additional authorities the People may cite during oral argument. Specifically, the People may cite *People v. Wandrey* (2022) 80 Cal.App.5th 962, 978-980 and *People v. Johnson* (2023) 88 Cal.App.5th 487, 494-505 on the issue of whether Penal Code section 667.6, subdivision (d) violates the Sixth Amendment.

Respectfully submitted,

/Melissa A. Meth/

MELISSA A. METH
Deputy Attorney General

For ROB BONTA
Attorney General

MAM:

**DECLARATION OF ELECTRONIC SERVICE AND SERVICE BY U.S.
MAIL**

Case Name: **People v. Edgar Sandoval Catarino**
No.: **S271828**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collecting and processing electronic and physical correspondence. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business. 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 March 21, 2023, I electronically served the attached **LETTER RE: ADDITIONAL AUTHORITIES** by transmitting a true copy via this Court's TrueFiling system. Because one or more of the participants in this case have not registered with the Court's TrueFiling system or are unable to receive electronic correspondence, on March 21, 2023, I placed a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 455 Golden Gate Avenue, Suite 11000, San Francisco, CA 94102-7004, addressed as follows:

Ronald Richard Boyer
Attorney at Law
boyer@mac.com

Santa Clara County Superior Court
Criminal Division - Hall of Justice
191 North First Street
San Jose, CA 95113-1090
Served by U.S. Mail

The Honorable Jeffrey F. Rosen
District Attorney
Santa Clara County District
Attorney's Office
DCA@dao.sccgov.org

Sixth District Appellate Program
servesdap@sdap.org

Sixth Appellate District
California Court of Appeal
sixth.district@jud.ca.gov

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on March 21, 2023, at San Francisco, California.

Nelly Guerrero

Declarant

/Nelly Guerrero/

Signature

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. CATARINO**
Case Number: **S271828**
Lower Court Case Number: **D078832**

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: **Melissa.Meth@doj.ca.gov**
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	S271828_LTR_Catarino

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Melissa Meth Attorney General's Office 263571	Melissa.Meth@doj.ca.gov	e-Serve	3/21/2023 1:56:16 PM
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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.

3/21/2023

Date

/s/Nelly Guerrero

Signature

Meth, Melissa (263571)

Last Name, First Name (PNum)

California Dept of Justice, Office of the Attorney General

Law Firm