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November 22, 2024

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

re: **People v. Ramon Patton**
Supreme Court No. S279670

Dear Mr. Navarrete:

Pursuant to rule 8.520(d)(1) of the California Rules of Court, appellant submits this letter to notify the Court of two published cases, decided after appellant filed his Reply Brief on the Merits, both of which address directly the issue on review in this case:

People v. Williams (2024) 103 Cal.App.5th 375, review granted,
September 11, 2024, S286314

People v. Alazar (October 21, 2024, B331710) 105 Cal.App.5th 1100
[2024 WL 4531321]

Respectfully Submitted,

JONATHAN E. DEMSON
Attorney for Appellant

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v.
PATTON**

Case Number: **S279670**

Lower Court Case Number: **B320352**

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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.

11/22/2024

Date

/s/Jonathan Demson

Signature

Demson, Jonathan (167758)

Last Name, First Name (PNum)

Jonathan E. Demson, Attorney at Law

Law Firm