

SUPREME COURT COPY

S235549

IN THE SUPREME COURT OF THE STATE OF CALIFORNIA

PATRICK LOWELL JACKSON,

Petitioner,

v.

SUPERIOR COURT OF CALIFORNIA,
IN AND FOR THE COUNTY OF
RIVERSIDE,

Respondent,

THE PEOPLE OF THE STATE OF
CALIFORNIA,

Real Party In Interest.

REQUEST TO CITE
TO RECENT
LEGISLATION IN
ORAL ARGUMENT

**SUPREME COURT
FILED**

SEP 26 2017

Jorge Navarrete Clerk

Fourth Appellate District, Division One, No. E064010
Riverside County Superior Court No. INF1500950
Honorable Mark E. Johnson

Deputy

REQUEST TO CITE TO RECENT LEGISLATION IN ORAL
ARGUMENT

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**TO: THE HONORABLE TANI CANTIL-SAKAUYE, CHIEF
JUSTICE, AND HONORABLE ASSOCIATE JUSTICES OF
THE SUPREME COURT OF CALIFORNIA:**

Real party requests to cite to the legislative analysis and bill text for Senate Bill 684 that was chaptered on September 11, 2017. This bill and the legislative analysis underlying the bill is significant to this case because it substantively amends Penal Code section 1370 and also addresses making proposed changes to Penal Code section 1370 in response to the appellate opinion *Jackson v. Superior Court of Riverside County* (2016) 247 Cal. App. 4th 767, which is the extant case. (See e.g., Sen. Comm. on Pub. Saf., Analysis of Sen. Bill 684 (2017-2018 Reg. Sess.), as amended February 17, 2017, pp. 6, 8.) Real party recognizes that this request is untimely as it has not been made 10 days before the hearing; however, real party asks that this

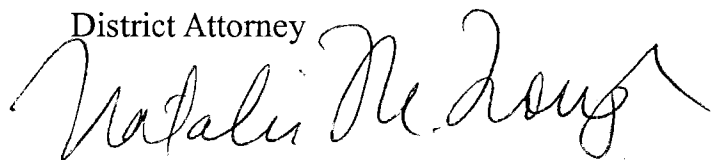
Court find good cause to excuse this delay given the newness of the legislation. Real party did not discover this bill had been passed until September 25, 2017, while preparing for oral argument. Real party does not wish its delay to limit this Court's review or analysis of the ultimate issue. Thus, real party requests this Court allow citation during oral argument to the following new authorities:

- Senate Bill 684, including bill text and all analysis, including previous versions

Dated: September 25, 2017

Respectfully submitted,

MICHAEL A. HESTRIN
District Attorney

A handwritten signature in black ink, appearing to read "Natalie M. Lough". The signature is written in a cursive, flowing style with a long, sweeping tail on the right side.

NATALIE M. LOUGH
Deputy District Attorney

DECLARATION OF ELECTRONIC SERVICE

Case No. S235549

I, the undersigned, declare:

I am employed in the County of Riverside, over the age of 18 years and not a party to the within action.

My business address is 3960 Orange Street, Riverside, California.

My electronic service address is Appellate-Unit@RivCoDa.org.

That on September 25, 2017, I served a copy of the within, **REQUEST TO CITE TO RECENT LEGISLATION IN ORAL ARGUMENT**, by electronically serving the following parties:

Public Defender's Office
LOPDAppellateUnit@rivco.org

Riverside County Superior Court
appealsteam@riverside.courts.ca.gov

Appellate Defender's, Inc.
eservice-court@adi-sandiego.com

Attorney General's Office
sdag.docketing@doj.ca.gov

**Court of Appeal
Fourth District
Division Two
E064010
(via TrueFiling)**

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Dated: September 25, 2017



ESPERANZA GARCIA