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**SUPREME COURT COPY**

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\*Admitted in California only

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Reply to:

- 2626 Harrison St.  
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Col. Libertad, C.P. 21030  
Mexicali, Baja California  
México  
Tel: (52-65) 57-24-58

April 13, 2016

**SUPREME COURT  
FILED**

APR 18 2016

Honorable Frank A. McGuire  
Clerk, California Supreme Court  
350 McAllister Street  
San Francisco, CA 94102

Frank A. McGuire Clerk  
Deputy

Re: People v. Louis Zaragoza  
No. S97886

Dear Mr. McGuire,

Please bring to the Court's attention the following "focus issues" for the May 4, 2016, oral argument in the above-entitled case:

1. Argument II (errors related to trial court's refusal to allow appellant to call his co-defendant, the only person linked to the crime's commission by physical evidence, as a witness on his behalf);
2. Argument X (trial court's wrongful excusal of two prospective jurors).

Best wishes to you. If you have any questions, please call or write.

Sincerely yours,

Michael Snedeker  
Attorney for Appellant  
Louis Rangel Zaragoza

**DEATH PENALTY**

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San Francisco, CA 94102

**SUPREME COURT  
FILED**

APR 18 2016

Frank A. McGuire Clerk

Deputy  
Re: People v. Louis Zaragoza  
No. S097886

Dear Mr. McGuire,

Please bring to the Court's attention the following cases that have been decided since briefing was completed in the above-entitled case:

1. Arguments II (errors related to trial court's refusal to allow appellant to call his co-defendant, the only person linked to the crime's commission by physical evidence, as a witness on his behalf); *Harris v. Brown* (2012) 698 F.3d 709 [reversible error to not allow defendant to subpoena material witness on grounds of incompetence] and

2. Argument X (error to peremptorily dismiss two prospective jurors who said they could follow the law); *People v. Leon* (2015) 61 Cal.4th 569, 590 [Written and oral voir dire responses of panelists did not give the court sufficient information to conclude they were incapable of performing their duties as capital jurors].

Best wishes to you. If you have any questions, please call or write.

Sincerely yours,

Michael Snedeker  
Attorney for Appellant  
Louis Rangel Zaragoza

**DEATH PENALTY**

**DECLARATION OF SERVICE BY MAIL**

Re: *People v. Zaragoza*, Supreme Court No. S097886

I, Michael R. Snedeker, declare that I am over 18 years of age and am not a party to this action. My business address is PMB 422, 4110 SE Hawthorne Blvd., Portland, OR 97214-5246. I served a copy of the attached:

**APPELLANT'S LETTER REGARDING FOCUS ISSUES,  
APPELLANT'S LETTER CITING NEW AUTHORITIES**

on each of the following by placing same in an envelope addressed respectively as follows:

Louis Rangel Zaragoza, #T-18228 CSP-SQ 2-EB-109 San Quentin, CA 94974	Peter Smith, Deputy Attorney General 1300 I Street, Suite 125 Sacramento CA 95814
--	---

Charles Press, Staff Attorney  
California Appellate Project  
101 Second Street  
San Francisco, CA 94105

Each said envelope was then, on April 13, 2016, sealed and deposited in the United States mail in Portland, Oregon, with postage fully prepaid.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Portland, Oregon, this 13th day of April, 2016.

  
MICHAEL R. SNEDEKER