

# SUPREME COURT COPY

## SNEDEKER, SMITH & SHORT

Attorneys at Law

PMB 422  
4110 S.E. Hawthorne Blvd.  
Portland, Oregon 97214

Tel: (503) 234-3584  
Fax: (503) 232-3215

Michael R. Snedeker\*  
James F. Smith\*  
Lisa R. Short\*\*  
Lic. Daniel Solorio Ramirez  
Of Counsel  
Kami J. White  
Certified Law Student

\*Admitted in California only

\*\*Admitted in California and Oregon

Reply to:

- 2626 Harrison St.  
Oakland, California 94612  
Tel: (510) 839-9230
- P.O. Box 72451  
Davis, California 95617  
Tel: (530) 757-1036
- Av. Electricistas no. 2033 Altos  
Col. Libertad, C.P. 21030  
Mexicali, Baja California  
México  
Tel: (52-65) 57-24-58

SUPREME COURT  
FILED

APR 26 2016

Frank A. McGuire Clerk  

---

Deputy

April 22, 2016

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

Re: People v. Louis Zaragoza  
No. S097886

Dear Mr. McGuire,

Please bring to the Court's attention the following amended list of 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. Thompson* (7<sup>th</sup>. Cir., 2012) 698 F.3d 609 [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

cc: DAG Peter Smith  
Charles Press, Esq.  
Louis Rangel Zaragoza

DEATH PENALTY

AMENDED 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:

**AMENDED LETTER RE NEW CASES**

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 23, 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 23d day of April, 2016.

  
MICHAEL R. SNEDEKER