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February 21, 2025

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

**CAPITAL CASE**

Re: *People v. Joseph Anthony Barrett, S124131*  
**Focus Letter**

Dear Mr. Navarrete:

This case is scheduled for oral argument on Wednesday, March 5, 2025, at 9:00 a.m. I am counsel of record and will be presenting argument in this case.

I expect to focus my argument on the following issue: the trial court's refusal to excuse all California Department of Corrections employees as prospective jurors violated state and federal law, as set forth in Argument I of Appellant's Opening Brief and Argument I of Appellant's Supplemental Opening Brief.

Time permitting, I will turn my focus to the argument that the prior murder special circumstance finding and Mr. Barrett's death sentence must be reversed because Mr. Barrett was 16 years old at the time of the prior offense, as set forth in Argument XIII of Appellant's Opening Brief and Argument III of Appellant's Supplemental Opening Brief.

I do not plan to address issues raised in Arguments II through XII, or IX through XXII, of Appellant's Opening Brief, or Argument II of Appellant's Supplemental Opening Brief. Given that I have recently been assigned to represent Mr. Barrett, and to allow effective preparation for the oral argument, I respectfully request that the Court inform the parties if the

Court wishes us to address any issues aside from the focus issues identified above.

Thank you for bringing this letter to the Court's attention.

Sincerely,

/s/

Catherine White  
Deputy State Public Defender

Attorney for Appellant

## DECLARATION OF SERVICE

Case Name: ***People v. Joseph Anthony Barrett***  
Case Number: **Cal. Supreme Ct. No. S124131**  
**Imperial County Sup. Ct. No. CF5733**

I, **Glenice Fuller**, declare as follows: I am over the age of 18 and not a party to this cause. My business address is 1111 Broadway, Suite 1000, Oakland, California 94607. I served a true copy of the following document:

### FOCUS LETTER

By enclosing it in envelopes and placing the envelopes for collection and mailing with the United States Postal Service with postage fully prepaid on the date and at the place shown below, following our ordinary business practices.

The envelope was addressed and mailed on **February 21, 2025**, as follows:

Joseph Barrett, CDCR# D-72002 D-8154-L CMC-SP P.O. Box 8101 San Luis Obispo, CA 93409	Death Penalty Appeals Clerk Imperial County Superior Court c/o Appeals Division 939 West Main Street El Centro, CA 92243
Imperial County District Attorney 940 West Main Street, Suite 102 El Centro, CA 92243	

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The following were served the aforementioned document electronically via TrueFiling on **February 21, 2025**:

Office of the Attorney General – San Diego Anne Spitzberg Deputy Attorney General 600 West Broadway., Suite 1800 San Diego, CA 92101 <a href="mailto:anne.spitzberg@doj.ca.gov">anne.spitzberg@doj.ca.gov</a> Sdag.docketing@doj.ca.gov	California Appellate Project 425 California Street, Suite 800 San Francisco, CA 94104 <a href="mailto:filing@capsf.org">filing@capsf.org</a>
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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. Signed on **February 21, 2025**, at Solano County, California.

Glenice  
Fuller  
  
Digitally signed by  
Glenice Fuller  
Date: 2025.02.21  
15:43:23 -08'00'  
\_\_\_\_\_  
GLENICE FULLER

**STATE OF CALIFORNIA**  
Supreme Court of California

**PROOF OF SERVICE**

**STATE OF CALIFORNIA**  
Supreme Court of California

Case Name: **PEOPLE v. BARRETT (JOSEPH ANTHONY)**

Case Number: **S124131**

Lower Court Case Number:

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: **catherine.white@ospd.ca.gov**
3. I served by email a copy of the following document(s) indicated below:

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This proof of service was automatically created, submitted and signed on my behalf through my agreements with TrueFiling and its contents are true to the best of my information, knowledge, and belief.

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

2/21/2025

Date

/s/Glenice Fuller

Signature

White, Catherine (193690)

Last Name, First Name (PNum)

Office of the State Public Defender

Law Firm