

From: [Aron DeFerrari](#)
To: [Chris Walpole](#)
Subject: FW: PC 745 Motions: Bryant/Jackson, 5-152003-0
Date: Monday, June 7, 2021 7:07:00 PM
Attachments: [Bryant 745 Declaration.pdf](#)
[Bryant 745\(a\)\(2\).pdf](#)
[Bryant 745\(d\).pdf](#)
[image002.jpg](#)

Hey Chris,

Before even getting to the merits (which are seriously lacking), I think these motions have a retro problem – you convicted these guys well before 745 became law. Not sure I buy off on Evan's arguments about 745 applying here – what do you think of farming this retro issue out to Wagner and his team of 2L's to weigh in on? I'm out this week and next, but this is probably worth getting the ball rolling on now if you think it's worthwhile to cut this off at the pass before we get into the weeds on the (offensive and inane) argument Kuluk makes throughout these motions.

I talked to Rhonda last week and told her that 7/23 was the day we were going to finish this – stupid me, I should've known better. I'll call her when I get back to let her know there is another round of ridiculousness to wade through.

-DeFerrari

From: Evan Kuluk [REDACTED]
Sent: Monday, June 7, 2021 2:24 PM
To: Department 36 [REDACTED]; Criminal Research Attorneys [REDACTED]
Cc: Matt O'Connor [REDACTED]; Matt O'Connor [REDACTED];
Aron DeFerrari [REDACTED]; Chris Walpole [REDACTED]
Subject: PC 745 Motions: Bryant/Jackson, 5-152003-0

Good afternoon,

Attached please find courtesy copies of defendant Gary Bryant's motions pursuant to Penal Code 745, the California Racial Justice Act.

Evan Kuluk (he/him)
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