

Jacqueline Vizcarrondo

From: Christopher Dugan
Sent: Sunday, July 4, 2021 8:42 PM
To: Chris Sansoe
Cc: Chris Sansoe
Subject: Re: Drafts of Vindictive Prosecution and RJ Motion
Attachments: vindictive prosecution Edits.doc; 745-Post Trial Motion edits 2.docx

Good Evening Chris,

I made a few suggestive edits to the vindictive prosecution response and the 745.

I have not finishing going through the case law to insert the required citations.

I just wanted to get these edits to you ASAP before Tuesday.

Happy 4th

Sincerely,
Chris Dugan

From: Chris Sansoe [REDACTED]
Sent: Tuesday, June 29, 2021 1:15 PM
To: Christopher Dugan [REDACTED]
Subject: Drafts of Vindictive Prosecution and RJ Motion

Hey Chris,
So I came to the office and punched out what I hope are the final drafts of the vindictive prosecution motion and the racial justice motion.

For the vindicate prosecution motion I included a word document and a PDF. The PDF has the exhibits attached. Let me know what you think.

On the RJ Motion I made some changes but not all of them and here is why I am keeping certain things:

1. I am going to refer to him as Defendant Vargas and not Defendant because there were four defendants.
2. Maybe a few other things

For the RJ Motion I included a word copy with your changes and a PDF copy.

Lets take a final look and we can file next week.

Excellent work

Chris Sansoe

Deputy District Attorney
Contra Costa County

