

Jacqueline Vizcarrondo

From: Christopher Dugan
Sent: Monday, July 5, 2021 7:14 PM
To: Chris Sansoe
Cc: Chris Sansoe
Subject: Re: Drafts of Vindictive Prosecution and RJ Motion
Attachments: Final vindictive prosecution Edits.doc; Final 745-Post Trial Motion edits .docx

Good Evening Chris,

I have attached the final edits for each motion.

See you tomorrow afternoon.

Sincerely,
Chris D.

From: Chris Sansoe [REDACTED]
Sent: Monday, July 5, 2021 10:52 AM
To: Christopher Dugan [REDACTED] >
Subject: RE: Drafts of Vindictive Prosecution and RJ Motion

The edits look great. I can see you really put some good time and effort into this. I appreciate that. Once the last citations are done we can send this off to the court. My plan is to swing by tomorrow and we can meet and discuss. Im thinking the PM if you have an AM prelim.

Thanks,
Chris

From: Christopher Dugan [REDACTED]
Sent: Sunday, July 04, 2021 8:42 PM
To: Chris Sansoe [REDACTED]
Cc: Chris Sansoe [REDACTED]
Subject: Re: Drafts of Vindictive Prosecution and RJ Motion

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
[REDACTED]

