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FILED
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SUPERIOR COURT
OF CALIFORNIA
COUNTY OF FRESNO

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF FRESNO**

10 THE PEOPLE OF THE STATE)
OF CALIFORNIA,)
11)
Plaintiff and Respondent,)
12)
13 vs.)
14 KEITH ZON DOOLIN,
15 Defendant and Petitioner.)

CASE NO.: CF96554289
D.A. NO.: 1995H414
PEOPLE'S/RESPONDENT'S
OPPOSITION TO DEFENDANT'S
ONGOING REQUESTS FOR IN-
CAMERA INSPECTION.

Date: November 15, 2019
Time: 9:00 a.m.
Dept.: 54
Judge Kristi Culver-Kapetan

19
20 TO THE HONORABLE JUDGE KRISTI CULVER-KAPETAN, AND TO THE
DEFENDANT/PETITIONER AND HIS ATTORNEYS OF RECORD HEREIN:

21
22 The People of the State of California, by and through their attorney, the District Attorney
23 for the County of Fresno, respectfully submit the following opposition to the
24 defendant/petitioner's request for further perceived discovery.

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26 *Once again*, the defense is claiming the People are improperly withholding case
27 documentation using accusatory terminology such as 'refusal, scant material provided, suspect
28 claim of privilege, and resisting discovery'. After reviewing our case file and bringing the matter

1 repeatedly before this court, defense counsel has once again resorted to the filing of moving
2 papers to advance what appears to be some personal interest as well as in contravention of the
3 Court's last directive to make a phone call to the Court if any further requests were to be made.
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5 On June 26, 2019, this Court requested if the People would be willing to prepare a log of
6 work product removed from our original case file. The People agreed to do so and an Order
7 dated June 26, 2019 documented this initial request and also stated that the parties were to notify
8 the clerk if an informal conference was needed. Instead of following court directives regarding a
9 future informal conference call if needed, the defense instead gave brief notice to that direction
10 on Page 2, Line 4 of their newly filed motion
11

12 Defense counsel has now prepared a seven-page motion with multiple attachments and are
13 seeking yet another court hearing which may require them to travel or even appear
14 telephonically with all attendant costs. The People are of the mind that the defense is more
15 interested in supplementing their own work product files instead of following Court orders.
16 Repetitive baseless accusations of hiding documents beneficial to the convicted party can no
17 longer be characterized as being petty in nature, but have now past the point of being ridiculous
18 and are marching on toward harassment.
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20 As such, the People are requesting the Court to issue monetary sanctions against defense
21 counsel covering Court time, the People's time in creating the previously supplied work product
22 log, as well as a refusal to justify any defense costs in bringing this motion.
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1 CONCLUSION

2 The People request sanctions be directed towards the defense based on bad faith dealings
3 in this matter as well as denying their request for an in-camera inspection. Any further
4 objections would be presented orally at the next hearing date depending on what new allegations
5 the defense decides to argue.
6
7

8
9 DATED: 10/29/19

RESPECTFULLY SUBMITTED,
LISA A. SMITTCAMP
DISTRICT ATTORNEY

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12 By: Robert L. Romanacce
13 Robert L. Romanacce
14 Chief Deputy District Attorney
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1 PROOF OF SERVICE

2 Case Name: People vs. **Keith Doolin**

Court Case No.: **CF96554289**

3 STATE OF CALIFORNIA, COUNTY OF FRESNO

4 I am employed in the County of Fresno, State of California. I am over the age of 18 and not a
5 party to the within action: My business address is 2220 Tulare Street, Suite 1000, Fresno, California
6 93721.

7 On October 29, 2019, I served the foregoing document described as **PEOPLE’S/RESPONDENT’S**
8 **OPPOSITION TO DEFENDANT’S ONGOING REQUESTS FOR IN-CAMERA**
9 **INSPECTION** on the interested parties in this action by mail and via email a true copy thereof to:

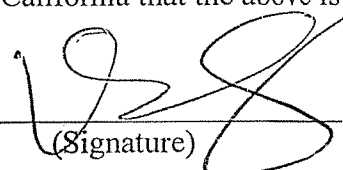
10
11 Robert R. Bryan
12 1955 Broadway, Suite 605
13 San Francisco, CA 94109
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15
16 Pamela Sayasane
17 660 – 4th Street, No. 341
18 San Francisco, CA 94107
19 SavasaneLaw@yahoo.com

20 Executed on October 29, 2019, in Fresno, California.

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

23 Rosanna Perez, Senior Legal Assistant


(Signature)