SUMMARY OF DISCOVERY REVIEW

People v. Marcus Hale (fictional) | Superior Court of California, County of Lassen | Case No. 26CR00412 | D.A. No. 26-0947

Prepared for: Elena R. Castillo, Attorney at Law, State Bar No. 999234 (fictional) | Prepared by: VdVLaw, Legal Support Services | August 20, 2026

Fictional demonstration matter. Method and format are VDVLAW's actual work product standard; all case facts, persons and identifiers are invented.

1. Purpose

This Summary states what the production reviewed establishes, what it does not establish, and what would resolve the difference, ahead of the October 15, 2026 preliminary hearing and while the People's penalty decision is pending. It supports the three-page Case Quick Reference and is supported by the Detailed Source Review and Evidence Audit (document 03), held in the matter file and available on request in whole or in part.

Conservative language is used throughout. Items described in the record but not found in the production are described as not located in the production reviewed, never as missing or destroyed. Competing medical theories are not asserted from the paper record; the review identifies what an expert would need, not what an expert would conclude.

2. Controlled case facts

Client	Marcus Hale, CDCR No. CT-2210 (fictional), incarcerated at Sierra Valley State Prison (fictional), Lassen County; in custody, held without bail
Decedent	Renee Hale, 59, the client's wife, who traveled voluntarily for a two-night family visit in Family Visiting Unit 3 (fictional)
Event	Visit March 17 to 19, 2025. On March 18 Renee developed dizziness, vomiting, chest pressure, and a rapid irregular pulse; institutional medical and fire personnel reportedly evaluated her, recommended hospital transport, and documented a refusal. Early March 19 the client reported finding her unresponsive and called the housing unit; staff responded, CPR and an AED were used, and she was pronounced at 2:36 a.m. (fictional)
Forensic posture	First autopsy, April 14, 2025: death attributed to manual neck compression, based on conjunctival petechiae and focal hemorrhage in neck musculature. Coroner homicide ruling followed. Defense-requested re-examination, February 10, 2026: inconclusive because of the prior autopsy, embalming, tissue removal, and decomposition, while documenting significant cardiac disease (fictional)
Charge	Complaint filed June 3, 2026 (D1 Bates 000001-000007): murder, Pen. Code, § 187, subd. (a), with a special-circumstance allegation under § 190.2, subd. (a)(2) (prior murder conviction) and prior-conviction and strike allegations. Arraignment June 5, 2026. The People have not announced whether death will be sought
Counsel	Elena R. Castillo, State Bar No. 999234 (fictional); Deputy District Attorney M. Okafor (fictional); Hon. K. Marsh (fictional)
Production reviewed	11.84 GB repository; 4,126 Bates-stamped document pages; 97 prison call files (95 unique after duplicate control); 8 core recorded interviews with working transcripts; 19 video files; 108 audio files; 236 indexed photographs; 642 medical pages; 2 autopsy reports or reviews; 3 toxicology or laboratory packets; 11 digital and administrative exports

3. What the record establishes

The following are anchored by institutional, medical, forensic, or business records in the production reviewed.

Established point	Record basis
Pre-visit medical complaints	The pre-visit calls document palpitations, dizziness, nausea, medication uncertainty, a missed dose, fatigue, reduced intake, and a home monitor reading of pulse 118 with blood pressure 154/92; Renee reported improvement during the drive to the institution (C1).
The visit and the dinner plan	The special dinner was discussed before the visit; the battery candles, table runner, and dinner setup were planned, not arranged after the death (C1; I1).
The overnight response	Staff and responder records document the unit call, response, CPR and AED use, and pronouncement at 2:36 a.m. (D1; P1: 31 emergency-response photographs).
The first-autopsy opinion	The first autopsy attributes death to manual neck compression, resting on conjunctival petechiae and focal neck-muscle hemorrhage (F1).
The re-examination limits	The later examination could not assign a specific cause of death because of the prior autopsy, embalming, tissue removal, and decomposition, and it documented significant cardiac disease (F1).
Statement consistency on major events	The client's two interviews match on the major sequence: illness, medical response, recommended transport, refusal, dinner, count, discovery, and the call for help. One detail differs: whether he rolled her shoulder and lifted her chin, or touched only her jaw and wrist (I1; EP-004).
What the reviewed record does not contain	No confession, no direct threat, and no verified statement that Renee planned to end the relationship appear in the reviewed calls and interviews (C1; I1).

4. What the record does not establish

Not established	State of the record
Cause of death	The first-autopsy opinion is contested and its support package is incomplete in the production; the re-examination is inconclusive. Neither a homicide mechanism nor a competing natural cause is established on this record.
The location and character of the neck findings	The first-autopsy body diagram is not located in the production reviewed; without it, the claimed findings cannot be mapped or given to an expert with precision.
The March 18 medical response	Both interviews describe an evaluation, a transport recommendation, and a documented refusal. The patient-care report, vitals, any ECG, the signed refusal, dispatch and gate records are not located; the account is testable but untested.
Which handling account is accurate	The interviews differ on one post-discovery handling detail. The original recordings and first-responder observations are needed before the difference is treated as an inconsistency.
A financial motive	The calls contain an insurance reference; the policy, ownership, beneficiary designations, and change history are not located. A reference is not a motive.
Authorship of the relationship messages	Account-access and authorship records are not located; emotional language in messages is evidence of friction in that exchange, not of intent.
The special-circumstance predicate	The complaint repeats prior-conviction entries that appear identical in the produced copy; certified prior records are not located. The § 190.2, subd. (a)(2) allegation is unverified on this production.
An independent physical case	The scene index identifies no weapon and no laboratory result that independently establishes an assault; the physical evidence is, at present, the pathology dispute itself.

5. The charge and what turns on it

5.1 Count 1: Pen. Code, § 187, subd. (a), murder

Elements: an unlawful killing with malice aforethought. Degree is not specified in the complaint. Exposure: first degree, 25 years to life; second degree, 15 years to life (Pen. Code, § 190, subd. (a)). Prosecution reading: the first-autopsy opinion, the two alone overnight, the statement detail difference, relationship friction, and the insurance reference. Defense testing points: the pathology foundation is incomplete (EP-001); the re-examination is inconclusive with cardiac disease documented; the treatment-artifact question is open (EP-002); and the March 18 medical episode, if corroborated, was documented before anyone had a homicide theory (EP-003).

5.2 The special circumstance and the penalty posture

The complaint alleges a prior murder conviction under Pen. Code, § 190.2, subd. (a)(2). If the murder is first degree and the special circumstance is found true under § 190.4, the penalty is death or life without parole (§ 190.2, subd. (a)). The People have not announced whether death will be sought. Two consequences follow: the certified prior records must be obtained and verified before the allegation is treated as established (EP-010, PR-006), and mitigation-readiness planning should proceed now rather than after an election (DEC-004). No prediction about the election is made.

5.3 The client-communication and Faretta posture

The client has raised the possibility of self-representation. A plain-language status letter, with a respectful explanation of what self-representation would require in a complex forensic case, has been drafted for counsel to review, adapt, and send (document 07). The right recognized in Faretta v. California (1975) 422 U.S. 806, 819 belongs to the client, and the decision and any hearing are matters for the client, counsel, and the court; the drafting support takes no position on it.

6. Material not located in the production reviewed

Eight groups are not located; the held audit, section 5, carries the full table with the bearing of each. In brief: the first-autopsy support package, including the body diagram, notes, photograph log, original images, histology, and specimen inventory (the foundation of the homicide opinion); the March 18 responder records, including the patient-care report, vitals, any ECG in native format, the signed refusal, dispatch, and gate records (the corroboration test); the original interview recordings (the handling detail and any quotation); the insurance policy source documents (the claimed motive); certified prior-conviction records (the special-circumstance predicate); count, tower, and gate logs for the overnight (the timeline); photograph originals with timing metadata (treatment-artifact analysis); and account-access records for the messaging (authorship).

Nothing in this list is described as missing. Each item is not located in the production reviewed, and the request schedule asks each custodian to confirm what exists.

7. Reliability of machine-generated and summary material

The working transcripts of the calls and interviews are machine-generated search aids, reviewed for speaker continuity; no passage should be quoted or used for impeachment without verification against the original recording, and the handling-detail difference in particular should not be characterized until the original audio is heard. No video was viewed, no audio was heard, and no photograph was inspected at full resolution in preparing this Summary; the photographic groups are indexed for expert review. The duplicate-controlled register treats 95 of the 97 call files as unique; file counts are not evidence counts.

8. Recommended requests, staged

The following sequence is recommended for counsel to accept, modify or reject. Identifiers refer to the request schedule in the held audit.

ID	Request and timing
PR-001	Informal discovery letter to the District Attorney (Pen. Code, §§ 1054.1, 1054.5, subd. (b)): the complete first-autopsy support package including the body diagram; original interview recordings; the March 18 medical-response records; incident, count, tower, and gate records for Unit 3; laboratory and toxicology source packets; photograph originals with metadata. First, now; the preliminary hearing date controls.
PR-002	Preservation notices to the custodians the record identifies: institution litigation coordinator, investigative services and evidence, visiting and control, health-care administration, the fire and emergency-response unit, any outside EMS provider, dispatch, the coroner, and the communication provider for account records. Now; retention degrades.
PR-003	Institution health-care and Health Information Management records for the March 18 response, through the appropriate release process; the decedent's outside medical, cardiology, and pharmacy records through the route counsel directs. With PR-001.
PR-004	Third-party EMS, fire, and dispatch records: run record, CAD, radio traffic, and the refusal documentation, with native ECG or monitor data if it exists. With PR-002.
PR-005	Insurance carrier records: policy, face amount, ownership, beneficiary designations, applications, change history, and payment records. After PR-001 framing.
PR-006	Certified records of the alleged prior conviction from the originating court, to verify the § 190.2, subd. (a)(2) predicate. Now; central to the penalty posture.
PR-007	Media originals: the 8 interview recordings, priority call audio, the 19 video files, and photograph originals with timing metadata, under a media-handling protocol counsel approves. After PR-001 response.

9. The working file

Document 03, the Detailed Source Review and Evidence Audit, is held in the matter file and available on request in whole or in part. It contains the production inventory and duplicate-controlled register, the source registry with what each source can and cannot establish, the evidence problem log (EP-001 through EP-011), the charge analysis, the request schedule (PR-001 through PR-007), the open questions register (Q-001 through Q-008), and the verified authorities. This Summary, the Quick Reference, and the draft client letter are cut from it.

10. Decisions needed from counsel

ID	Decision
DEC-001	Whether to retain a forensic pathologist now, instructed from source materials rather than summaries, for the petechiae, neck-finding, and treatment-artifact questions.
DEC-002	Whether to retain a cardiology or internal-medicine consultant on the pre-visit symptoms, the March 18 episode, and the documented cardiac disease.
DEC-003	How to handle the client's Faretta question: whether to send the drafted status letter, adapted as counsel sees fit, and how to structure the discussion.
DEC-004	Mitigation-readiness planning while the penalty decision is pending: records, history, and staffing that would be needed if death is sought.
DEC-005	Whether to authorize the full records and preservation plan (PR-001 through PR-007) now or in stages.

11. Authorities

Authority	Point
Pen. Code, § 187, subd. (a)	Murder; Count 1.
Pen. Code, § 190, subd. (a)	Punishment: first degree 25 years to life; second degree 15 years to life.
Pen. Code, § 190.2, subds. (a), (a)(2)	Death or life without parole where a special circumstance is found true; prior murder conviction as a special circumstance.
Pen. Code, § 190.4	The special circumstance must be found true; procedural framework.
Pen. Code, §§ 1054.1, 1054.5, subd. (b)	Disclosure duties, and the informal request with 15-day procedure, supporting PR-001.
California v. Trombetta (1984) 467 U.S. 479, 488-489	Preservation doctrine for evidence with apparent exculpatory value; frames the body-diagram, specimen, and media requests. No destruction is established on this record.
Arizona v. Youngblood (1988) 488 U.S. 51, 58	Bad faith requirement for failure to preserve potentially useful evidence; frames any preservation motion realistically.
People v. Sanchez (2016) 63 Cal.4th 665, 686	An expert may not relate case-specific hearsay as true; bears on pathology, coroner, and toxicology opinions.
Faretta v. California (1975) 422 U.S. 806, 819	The self-representation right belongs to the accused; frames the client-communication posture only.

Authority verified August 20, 2026 against official or primary sources; statutes cited from the codified text. Demonstration copy: re-verify before any filing use.

Status of this document

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Methodology and limitations

AI tools assisted with organization, transcript preparation, cross-referencing, and drafting. The review was directed by VdVLaw, which specified the sources and the comparisons and required source-grounded results.he working transcripts are machine-generated search aids. Assertions were cross-checked internally against the production but not re-verified line by line. Original media and primary records control. This demonstration copy is built on a fully fictional record.