



ALAN WILSON
ATTORNEY GENERAL

June 6, 2013

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201
Via hand delivery

Re: State v. Michael Watson

Dear Ms. Kitchings:

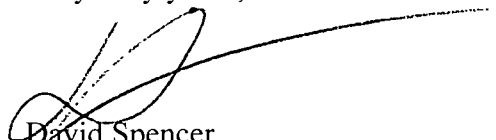
Oral argument was held Tuesday, June 4, 2013 in the above referenced case. During oral argument the question was raised whether a contemporaneous objection during trial was needed for a statement admitted into evidence when challenged pursuant to Jackson v. Denno, 378 U.S. 368 (1964) or Miranda v. Arizona, 384 U.S. 436 (1966) in order to preserve the issue for appeal, where the judge made a ruling on the challenge during a motion in limine. Pursuant to Rule 208(b)(7), SCACR, I would refer to the following cases as additional authority:

State v. Moses, 390 S.C. 502, 702 S.E.2d 395 (Ct. App. 2010) (finding defense counsel needed to renew her objection made during a motion in limine to a custodial statement introduced into evidence in order to preserve the issue on appeal).

State v. Wannamaker, 346 S.C. 495, 552 S.E.2d 284 (2001) (finding because counsel failed to renew the objection made during a motion in limine to the introduction of a custodial statement, the issue was not properly preserved for appellate review).

With kind regards, I am

Very truly yours,



David Spencer
Assistant Deputy Attorney General

cc: Katherine H. Hudgins, Esquire