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SC Court of Appeals

June 7, 2023

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RE: *State v. Robert L. Bailey*
Case No. 2022-000239

Ms. Kitchings,

Pursuant to Rule 208(b)(7), SCACR, counsel for the Respondent respectfully wishes to call to the Court's attention to the following additional authority just released today by the Supreme Court of South Carolina:

(1) *State v. Travis Latrell Lawrence, Op. No. 28156 (S.C. Sup. Ct. filed June 7, 2023).*

The Supreme Court decisively ruled on the codefendant statement issue Appellant brings up. In *Lawrence*, the Court found the codefendant properly asserted his Fifth Amendment right against self-incrimination and Lawrence was thus barred from subpoenaing and introducing his statements to the jury in Lawrence's separate trial.

By copy of this letter, I am notifying opposing counsel of the submission of this supplemental authority.

Respectfully,

s/Julianna E. Battenfield
Assistant Attorney General

