



RECEIVED

Sep 12 2024

S.C. SUPREME COURT

ALAN WILSON
ATTORNEY GENERAL

September 12, 2024

VIA Electronic Mail

The Honorable Patricia A. Howard
Clerk, South Carolina Supreme Court
Post Office Box 11330
Columbia, South Carolina 29211

Re: State v. Philip Guderyon
Appellate Case No.: 2023-000633

Dear Ms. Howard,

Oral argument was held in this case on September 10, 2024. Pursuant to Rule 208(b)(7) SCACR, Respondent respectfully wishes to call to the Court's attention the following additional authority:

Brown v. United States, 256 U.S. 335, 343 (1921) (Holmes, J.) ("Rationally the failure to retreat is a circumstance to be considered with all the others in order to determine whether the defendant went farther than he was justified in doing; not a categorical proof of guilt.").

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

Sincerely,

Joshua A. Edwards
Assistant Attorney General
Bar No. 101188

cc: Wanda Carter, Esq.