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SC Court of Appeals



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November 25, 2024

The Honorable Jenny Abbott Kitchings
Clerk, S.C. Court of Appeals
Post Office Box 11629
Columbia, S.C. 29211

Re: Johnny Haggins v. State, Appellate Case No. 2022-000176

Dear Ms. Kitchings:

The above-referenced case is scheduled for oral argument on Wednesday, December 4, 2024, before a panel of the Court of Appeals. Pursuant to Rule 208(b)(7), SCACR, I am submitting supplemental authority that is pertinent and significant authority for the issue presented in petitioner's brief. In *Osbey v. State*, 425 S.C. 615, 825 S.E.2d 48 (2019), the Supreme Court reversed the denial of PCR for a defendant who pleaded guilty without counsel, finding he had not effectively waived his right to counsel by his conduct because *Faretta* warnings are required for such a waiver. *Osbey* is therefore important to both parts of petitioner's argument in his brief.

If you have questions or require more information, please contact me.

Sincerely,

Jordan Wayburn
Appellate Defender

cc: Joshua Abraham Edwards