

**THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT**

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**IN THE ORIGINAL JURISDICTION**

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Mikal D. Madhi,  
*Petitioner,*

v.

Bryan P. Sterling, Commissioner  
South Carolina Department of Corrections,  
*Respondent.*

**RECEIVED**

**Mar 21 2025**

**S.C. SUPREME COURT**

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**MOTION TO FILE AMICUS CURIAE BRIEF**

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Pursuant to Rule 213, of the South Carolina Rules of Appellate Procedure, the South Association of Criminal Defense Lawyers, hereby Moves this Court to permit the filing of the attached Amicus Curiae Brief for the following reasons:

1. The South Carolina Association of Criminal Defense Lawyers (SCACDL) is an organization founded in 1992 which is dedicated to the improvement of the defense for people accused of violating the criminal laws in South Carolina. Presently more than 700 lawyers are members of SCACDL.

2. Part of the mission of SCACDL is to file amicus curiae briefs to promote consistency in the decisions of our courts and to urge the Court to expand or modify prior decisions in order to protect the rights of those accused of crime in South Carolina.

3. In this case, SCACDL wishes to call the attention of the Court to two areas that would

better protect those accused of a crime. First, SCACDL believes an inconsistency exists in the facts and ruling of this Court in this case and the holding of this Court in *Weik v. State*, 409 S.C. 214, 761 S.E.2d 757 (2014). Second, the Writ of Habeas Corpus on behalf of Mr. Madhi shows advances in the field of psychology that could impact the sentence given to Mr. Mahdi. SCACDL has an interest in having this Court applying advances in all sciences to review any conviction and when permitted, such as in this case, the sentence of a defendant.

Fore the foregoing reasons, the South Carolina Association of Criminal Defense Lawyers moves this this Court permit the filing of the attached amicus curiae brief.

March 21, 2025

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