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SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE

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Wanda H. Carter, Chief Appellate Defender

January 23, 2026

**RECEIVED**

**Jan 23 2026**

**SC Court of Appeals**

Honorable Jenny A. Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, S.C. 29211

Re: State v. Jesse Dewitt Osborne, Appellate Case No. 2023-001596

Dear Ms. Kitchings:

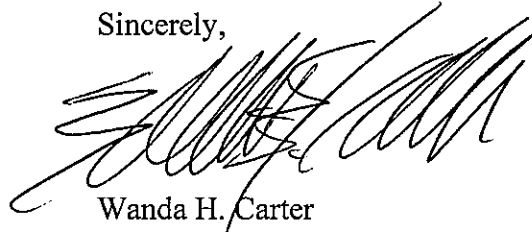
The above tilted case is set for oral argument on February 5, 2026. Pursuant to Rule 208(b)(7), SCACR, the undersigned counsel would submit the supplemental citations listed below to the Court on the ground that the same would be relevant to the sentencing issue raised on appeal in the case.

The above-named appellant was sentenced to life imprisonment on two murder convictions, but a resentencing hearing resulted in a seventy-five-year substitute sentence instead. In support of the argument that a seventy-five-year sentence for a juvenile is a de facto life sentence subject to an Eighth Amendment analysis under Miller v. Alabama, 567 U.S. 460 (2012), the following cases, which were referenced in State v. Slocumb, 426 S.C. 297, 827 S.E.2d, 148 (2019), are being submitted for the Court's review in the matter.

- 1.) McKinley v. Butler, 809 F.3d 908 (7th Cir.2016)
- 2.) Casiano v. Comm'r of Corr., 115 A.3d 1031 (Conn. 2015)
- 3.) Carter v. State, 192 A.3d 695 (Md.2018)
- 4.) Steilman v. Michael, 407 P.3d 313 (Mont. 2017)
- 5.) State v. Boston, 363 P.3d 458 (Nev. 2015)
- 6.) State v. Zuber, 152 A.3d 197 (N.J. 2017)
- 7.) Ira v. Janecka 419 P.3d 161 ( N.M. 2018)
- 8.) State v. Moore, 76 N.E.3d 1127 (Ohio 2016)
- 9.) Commonwealth v. Foust, 180 A.3d 416 (Pa. Super. Ct. 2018)
- 10.) State v. Ramos, 387 P.3d 650 (Was. 2017)
- 11.) Bear Cloud v. State, 334 P.3d 132 (Wyo. 2014)

Please distribute copies of this letter to all South Carolina Court of Appeals Justices assigned to this case on appeal.

Sincerely,

A handwritten signature in black ink, appearing to read 'Wanda H. Carter', written in a cursive style.

Wanda H. Carter  
Chief Appellate Defender

cc: Tommy Evans, Jr., Esquire