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June 30, 2011

S.C. SUPREME COURT

The Honorable Daniel E. Shearouse
Clerk
South Carolina Supreme Court
P.O. Box 11330
Columbia, S.C. 29211

RE: *Abdiyyah ben Alkebulanyahh v. State of South Carolina*

Dear Mr. Shearouse:

I am writing to correct an error that appears in Petitioner's Reply to respondent's Return to Petition for Writ of Certiorari, filed on June 28, 2011. Page eighteen of Petitioner's Reply references a recent *certiorari* grant by the United States Supreme Court in *Martinez v. Ryan*, 2011 WL 380903. The Reply incorrectly states that the question presented in *Martinez* is:

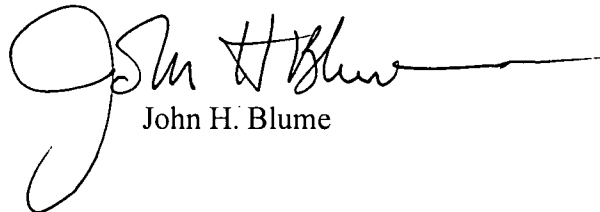
In a capital case, does the Sixth, Eighth, or Fourteenth Amendment guarantee a right to effective postconviction counsel to raise a claim of ineffective assistance of counsel at trial where postconviction proceedings represented the first opportunity that the claim of ineffective assistance of trial counsel could be presented?

In fact, this question presented is from the petition in *Marcel Williams v. Hobbs*, a previously pending petition for writ of *certiorari* that raised a substantially similar question. The question presented in *Martinez* is:

Whether a defendant in a state criminal case who is prohibited by state law from raising on direct appeal any claim of ineffective assistance of trial counsel, but who has a state-law right to raise such a claim in a first post-conviction proceeding, has a federal constitutional right to effective assistance of first post-conviction counsel specifically with respect to his ineffective-assistance-of-trial-counsel claim.

Because the question presented in *Martinez* differs only slightly from the language inadvertently quoted in Petitioner's Reply, the remainder of petitioner's arguments remain the same. I am informing opposing counsel of this matter by copy of this letter. If you should have any questions, please do not hesitate to contact me. I apologize for any inconvenience my error may have caused.

Sincerely,

A handwritten signature in black ink, appearing to read "John H. Blume". The signature is written in a cursive style with a long horizontal flourish extending to the right.

John H. Blume

cc: Alphonso Simon, Jr.