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February 5, 2015

VIA EMAIL (jkitchings@sccourts.org) AND HAND DELIVERED

The Honorable Jenny Abbot Kitchings  
Clerk of the South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: *State v. Venancia Diaz Perez*  
Appellate Case No. 2013-000179  
Oral Argument Date: February 5, 2015

**RECEIVED**  
FEB 05 2015  
**SC Court of Appeals**

Dear Ms. Kitchings:

I am writing in regard to the above-referenced case in which oral argument is scheduled at noon today. The State hereby submits, pursuant to Rule 208 (b)(7), the following additional authority in reference to Issue/Argument II is this case.

1. *Commonwealth v. Sealy*, 467 Mass. 617, 6 N.E.3d 1052 (2014); and
2. *State v. Buccheri-Bianca*, 233 Ariz. 324, 312 P.3d 123 (2013).

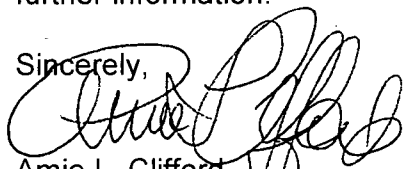
The State also hereby submits, pursuant to Rule 208 (b)(7), the following additional authority in reference to Issue/Argument I is this case.

1. *State v. McCombs*, 410 S.C. 90, 762 S.E.2d 744 (Ct. App. 2014).

A copy of each of these Courts' opinions is attached for the convenience of the Court. I talked to Appellant's counsel this morning and will be emailing him a copy of this letter and its attachments when they are emailed to you. I also told Mr. Luck that I would have a printed set to hand-deliver to him before the oral argument.

Thank you for your consideration. Please contact me if you have any questions or need further information.

Sincerely,



Amie L. Clifford  
Special Assistant Attorney General

Enclosures

cc: Jason Scott Luck, Esquire, and Robert M. Dudek, Chief Appellate Defender  
Counsel for Appellant

Assistant Deputy Attorney General Salley W. Elliott

(all with enclosures)