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SC Court of Appeals

ALAN WILSON
ATTORNEY GENERAL

March 9, 2015

The Honorable Jenny A. Kitchings
Clerk of Court
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211
Via hand delivery

Re: State v. Michael Andes, Appellate Case No. 2011-204706

Dear Ms. Kitchings:

Oral argument is scheduled in the referenced case for Wednesday, March 11, at 10:40 a.m. Pursuant to Rule 208(b)(7), SCACR, I would refer to the following as additional authority:

State v. Taylor, 404 S.C. 506, 745 S.E.2d 124 (Ct. App. 2013) (discussing the term "bolstering");

State v. Jefferson Perry, 410 S.C. 191, 763 S.E.2d 603 (Ct. App. 2014) (CJ Few, concurring) (citing Taylor favorably and discussing the term "bolstering");

State v. Damon T. Brown, Op. No. 5288 (S.C. Ct. App., filed January 7, 2015) (finding expert behavioral testimony about sexual assault victims was proper and not within the ordinary knowledge of the jury, finding the expert testimony did not improperly bolster victim's testimony, finding expert testimony had probative value).

Sincerely,

David Spencer
Senior Assistant Attorney General

cc: Benjamin John Tripp, Esquire
By mail and by email to BTripp@sccid.sc.gov