



ALAN WILSON  
ATTORNEY GENERAL

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MAR 10 2015  
**SC Court of Appeals**

March 10, 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  
SECOND ADDITIONAL AUTHORITY LETTER

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:

Graves v. CAS Medical Systems, Inc., 401 S.C. 63, 735 S.E.2d 650 (2012).

Sincerely,

  
David Spencer  
Senior Assistant Attorney General

cc: Benjamin John Tripp, Esquire  
By mail and by email to [BTripp@sccid.sc.gov](mailto:BTripp@sccid.sc.gov)