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August 20, 2015

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia, S.C. 29211

RECEIVED
AUG 20 2015
SC Court of Appeals

Re: State v. Lamar Brown, Appellate Case No. 2013-000725

Dear Ms. Kitchings:

The above-referenced case is currently pending before this Court after oral argument held May 2, 2015. This letter is pursuant to Rule 208(b)(7) SCACR, and counsel would respectfully draw the Court's attention to the following additional authority that bears on the issue of the extent of a person's reasonable expectation of privacy in cell phone data: United States v. Graham, ___ F.3d ___, 2015 WL 4637931 (4th Cir. Aug. 5, 2015).

By copy of this letter, I am notifying opposing counsel, Salley W. Elliott, of this submission of additional authority.

Sincerely,

David Alexander
Appellate Defender

c. Client
Salley W. Elliott, Esq.