



ALAN WILSON
ATTORNEY GENERAL

November 10, 2015

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SC Court of Appeals

VIA Hand Delivery

The Honorable Jenny Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: State v. Scott Eugene Williams

Appellate Case No.: 2013-002307

Dear Ms. Kitchings,

This case is scheduled for oral argument on November 12, 2015, at 10:40 a.m. in Courtroom I. Pursuant to Rule 208(b)(7) SCACR, Respondent respectfully wishes to call to the Court's attention the additional authority of Heien v. North Carolina, 135 S.Ct. 530 (2015), in further support of Appellant's argument no violation of the Fourth Amendment occurred even if the officer was mistaken, based on fact or law, in the distance Respondent travelled after cresting the hill prior to conducting the U-turn and whether his actions were sufficient to constitute a traffic violation. Further, the State submits State v. Nelson, 336 S.C. 186, 519 S.E.2d 786 (1999) in support of the State's argument that even if the checkpoint is invalid, the officer could still stop Respondent for the traffic violation. By copy of this letter, I am notifying opposing counsel of the submission of this supplemental authority.

Sincerely,

William M. Blich, Jr.
Assistant Attorney General
Bar No. 15608

cc: G. David Seay, Jr., Esquire



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The Honorable Jenny A. Kitchings
Clerk, SC Court of Appeals
1220 Senate Street
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