

December 23, 2015

The Honorable Daniel E. Shearouse
Clerk of Court
Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

RECEIVED

DEC 23 2015

S.C. Supreme Court

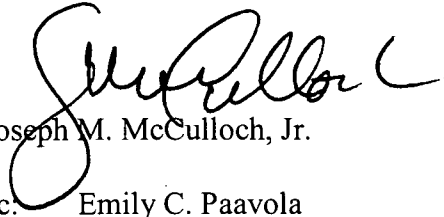
Re: *Simmons v. State*, No. 2014-000387

Dear Mr. Shearouse,

Please find enclosed for filing, with proof of service, the Motion for Leave to File Brief of the Innocence Network as *Amicus Curiae* in support of Mr. Simmons in his case on appeal. Copies of the Brief of The Innocence Network as *Amicus Curiae* are also enclosed in accordance with the rules of court.

If you should have any questions, please do not hesitate to contact me.

Sincerely,



Joseph M. McCulloch, Jr.

cc. Emily C. Paavola
Melody Jane Brown
Donald J. Zelenka