



ALAN WILSON  
ATTORNEY GENERAL

January 29, 2018

**VIA Hand Delivery**

The Honorable Daniel E. Shearouse  
Clerk, South Carolina Supreme Court  
Post Office Box 11330  
Columbia, South Carolina 29211

**Re: State v. Lamar S. Brown**  
Appellate Case No.: **2015-002360**

Dear Mr. Shearouse,

This case is scheduled for oral argument on January 31, 2018. Pursuant to Rule 208(b)(7) SCACR, Respondent respectfully wishes to call to the Court's attention the additional authority of United States v. Crumble, 878 F.3d. 656 (8<sup>th</sup> Cir. 2018) and United States v. Harris, 688 Fed. Appx. 223 (mem) (4<sup>th</sup> Cir. 2017). Both cases touch directly on the issue of the propriety of a warrantless search of an abandoned cell phone. 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: David Alexander, Esquire