

ALAN WILSON
ATTORNEY GENERAL

October 8, 2018

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SC Court of Appeals

HAND-DELIVERED

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

Re: State v. Felix Kotowski, Appellate Case No. 2016-000842

Dear Mr. Shearouse:

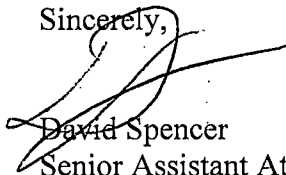
This concerns the above case, scheduled for oral argument tomorrow, October 9, 2018 at 10:40 a.m. Pursuant to Rule 208(b)(7) SCACR, Appellant respectfully wishes to bring this Court's attention the following additional authority:

State v. Dobbins, 420 S.C. 583, 803 S.E.2d 876 (Ct. App. 2017) (finding active meth lab created exigent circumstances);

Davis v. United States, 5654 U.S. 229, 231 (2011) (concerning whether the exclusionary rule should apply when law enforcement reasonably relies on binding precedent).

By copy of this letter, I am notifying opposing counsel of the submission of this supplemental authority.

Sincerely,



David Spencer
Senior Assistant Attorney General

cc: Lara M. Caudy, Esquire
lcaudy@sccid.sc.gov