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SC Court of Appeals

December 21, 2018

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


Re: The State v. Jon Paul Smart
Appellate Case No. 2017-001754

Dear Ms. Kitchings,

Pursuant to Rule 208(b)(7), SCACR, please accept this letter of supplemental citations in the above-captioned case. One of the authorities cited in the Initial Brief of Appellant has been affirmed in part and reversed in part by *People v. Skinner*, 917 N.W.2d 292 (Mich. 2018). This is relevant to the Standard of Review and to Appellant's Issue 3.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,


Joanna K. Delany
Appellate Defender

JKD/csb

cc: Sherrie Butterbaugh, Esq.