

Nelson Mullins

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December 18, 2015

Via Hand Delivery

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

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DEC 18 2015

S.C. SUPREME COURT

RE: Kenneth Simmons, SK5066 v. State of South Carolina
Case No. 2014-000387
Our File No. 33999/01341

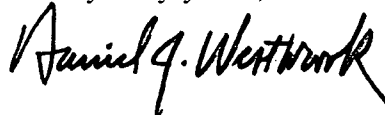
Dear Mr. Shearouse:

Enclosed are the following in the above matter:

1. Original and 6 copies of Motion for Leave to File Brief of the ARC of South Carolina, ABLE SC, SC AAIDD, Protection and Advocacy for People with Disabilities, Inc., and Family Connection of South Carolina as Amici Curiae in Support of Petitioner
2. Original and 15 copies of the Brief of the ARC of South Carolina, ABLE SC, SC AAIDD, Protection and Advocacy for People with Disabilities, Inc., and Family Connection of South Carolina as Amici Curiae in Support of Petitioner.
3. Proof of Service

By copy of this letter, I am serving Respondent with a copy of these documents.

Very truly yours,



Daniel J. Westbrook

DJW:myb

The Honorable Daniel E. Shearouse
December 18, 2015
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cc: Donald Zelenka, Esquire
Melody J. Brown, Esquire

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THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM THE DORCHESTER COUNTY
Court of Common Pleas

S.C. SUPREME COURT

The Honorable Doyet A. Early, Circuit Court Judge

Appellate Case No. 2014-000387

KENNETH SIMMONS, SK5066 Petitioner,

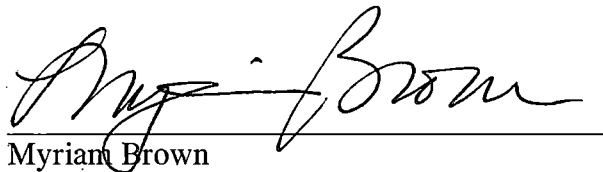
v.

STATE OF SOUTH CAROLINA Respondents.

PROOF OF SERVICE

This is to certify that I, the undersigned administrative assistant of Nelson Mullins Riley & Scarborough LLP, have this day served counsel of record in the foregoing matter with a copy of the foregoing *Motion for Leave to File Brief* and *Brief of the ARC of South Carolina, Able SC, SC AIDD, Protection and Advocacy for People with Disabilities, Inc., and Family Connection of South Carolina as Amici Curiae* in Support of Petitioner by depositing same in the United States Mail with proper postage affixed, addressed as follows:

Donald Zelenka, Esq.
Melody J. Brown, Esq.
S.C. Attorney General's Office
P. O. Box 11549
Columbia, SC 29211



Myriam Brown
Administrative Assistant

December 18, 2015

Columbia, South Carolina