

IN THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM HORRY COUNTY  
Court of Common Pleas

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Case No. 2017-CP-26-07411  
(Appellate Case No. 2020-000092)

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RECEIVED

Jan 20 2021

S.C. SUPREME COURT

Jimmy A. Richardson, II, Solicitor for the 15th Judicial Circuit,  
on Behalf of the 15th Judicial Circuit Drug Enforcement Unit ..... Appellant,

v.

Twenty Thousand Seven Hundred Seventy-One and 00/100 Dollars  
(\$20,771.00), U.S. Currency and Travis Green ..... Respondents.

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**UNOPPOSED MOTION FOR LEAVE TO FILE *AMICI CURIAE* BRIEF**

Pursuant to Rule 213 of the South Carolina Appellate Court Rules, the Southern Poverty Law Center and the National Police Accountability Project request leave to file the accompanying *amici curiae* brief in support of Respondents. These organizations are non-partisan organizations that advocate for victims of civil-rights violations.

*Amici* wish to bring to this Court's attention the impact that South Carolina's civil-forfeiture statutes have on Black people in particular. To this end, *amici* seek to provide the Court with historical sources, jurisprudence, and recent figures highlighting the importance of this decision for racial-justice issues in the state of South Carolina.

For the foregoing reasons, *amici* respectfully request that this this Court grant leave to present an *amici curiae* brief. A copy of the proposed brief is attached hereto, and is being conditionally filed with this motion in accordance with Rule 213 of the South Carolina Appellate

Court Rules. Appellant and Respondents have been notified of the accompanying motion for leave to file an *amici curiae* brief and have indicated that they do not object.

### **INTEREST OF AMICI**

*Amicus Curiae* the **Southern Poverty Law Center (“SPLC”)** has provided pro bono civil rights representation to low-income persons in the Southeast since 1971, with particular focus on combating unlawful discrimination and ending poverty. The SPLC provides educational materials, engages in policy reform, and develops litigation to eradicate economic penalties and punishment disproportionately impacting Black and Brown communities, to ensure meaningful access to social safety nets, including housing, and opportunities for economic investment in their communities.

*Amicus Curiae* the **National Police Accountability Project (“NPAP”)** is a nonprofit organization founded by members of the National Lawyers Guild. Members of NPAP represent plaintiffs in police misconduct and prison condition cases, and NPAP often presents the views of victims of civil rights violations through *amicus* filings in cases raising issues that transcend the interests of the parties before the Court. NPAP has more than five hundred attorney members throughout the United States.

DATED: January 20, 2021

Respectfully submitted,

/s/ Alan D. Clemmons

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*\*Motions for admission pro hac vice forthcoming*

Attorneys for *Amici Curiae* the Southern Poverty  
Law Center and the National Police  
Accountability Project