

**RECEIVED**

**Aug 13 2021**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

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Appeal from Saluda County

Honorable R. Keith Kelly, Circuit Court Judge

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MICHAEL DURAN WATSON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2018-000486

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CERTIFICATE OF SERVICE

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Pursuant to the Supreme Court's Order "RE: Operation of the Appellate Courts During the Coronavirus Emergency," dated March 20, 2020, the undersigned hereby certifies a true copy of the Brief of Petitioner in the above-referenced case has been served upon David Spencer, Esquire at the primary e-mail address listed in the Attorney Information System (AIS), this 13th day of August, 2021.

s/David Alexander  
Appellate Defender

ATTORNEY FOR PETITIONER