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S.C. SUPREME COURT

ALAN WILSON  
ATTORNEY GENERAL

September 17, 2021

**VIA HAND DELIVERY**

The Honorable Patricia A. Howard  
Clerk, South Carolina Supreme Court  
Post Office Box 11330  
Columbia, South Carolina 29211

Re: **State v. Mary Ann German**  
Appellate Case No.: **2018-002090**

Dear Ms. Howard,

This case is scheduled for oral argument on September 21, 2021, at 10:30 a.m. Pursuant to Rule 208(b)(7) SCACR, Petitioner respectfully wishes to call to the Court's attention the following additional authority: State v. Covert, 382 S.C. 205, 675 S.E.2d 740 (2009); Hammer v. Gross, 884 F.2d 1200 (9<sup>th</sup> Cir. 1989); Hammer v. Gross, 932 F.2d 842 (9<sup>th</sup> Cir. 1991) (rehearing en banc), cert. denied 502 U.S. 980 (1991); and Illinois v. Krull, 480 U.S. 340 (1987).

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

Sincerely,

  
For Joshua A. Edwards  
Assistant Attorney General

Bar No. 101188

JAE/aam

cc: David Alexander, Esquire (*via electronic mail*)