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S.C. SUPREME COURT

ALAN WILSON
ATTORNEY GENERAL

February 1, 2022

VIA ELECTRONIC FILING

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

Re: State v. Angela Brewer
Appellate Case No.: 2020-001345

Dear Ms. Howard,

The Court is scheduled to hold oral argument in the above case on February 2, 2022. Pursuant to Rule 208(b)(7) SCACR, Respondent respectfully wishes to call to the Court's attention the additional authority of United States v. Bass, 80 M.J. 114 (C.A.A.F. 2020) (finding lab report diagnostic and non-testimonial); State v. Mattox, 890 N.W. 256 (Wis. 2017) (finding toxicology report used to assist medical examiner in determining cause of death was not testimonial); State v. Hutchison, 482 S.W. 893 (Tenn. 2016) (finding autopsy report non-testimonial); People v. Leach, 980 N.E.2d 570 (Ill. 2012) (finding autopsy report non-testimonial). I apologize for the late notice of these additional citations. By copy of this letter, I am notifying opposing counsel of the submission of this supplemental authority.

Sincerely,

William M. Blicht, Jr.
Senior Assistant Deputy Attorney General
Bar No. 15608

cc: Susan B. Hackett, Esquire