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SC Court of Appeals

ALAN WILSON  
ATTORNEY GENERAL

February 4, 2022

The Honorable Jenny A. Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

Re: State v Shannon Earl Garland, 2018-002085

Dear Ms. Kitchings:

Oral argument is scheduled in the referenced case for Tuesday, February 8, 2022, at 11:20 a.m. Pursuant to Rule 208(b)(7), SCACR, I would refer to the following as additional authority:

State v. Makins, 433 S.C. 494, 860 S.E.2d 666 (2021) (finding treating therapists testimony was not bolstering);

State v. Thomas Stephen Acker, Op. No. 5892 (S.C. Ct. App. filed January 19, 2022) (rejecting argument that expert testimony was unreliable because it was based on the expert's own personal experiences);

State v. Jones, 423 S.C. 631, 817 S.E.2d 268 (2018) (discussing State v. Chavis, 412 S.C. 101, 817 S.E.2d 268 (2018)).

I am also forwarding a copy of this letter to opposing counsel.



ALAN WILSON  
ATTORNEY GENERAL

Susan B. Hackett  
February 4, 2022  
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Sincerely,

David Spencer  
Senior Assistant Attorney General

cc: Susan B. Hackett, Esquire  
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