

**RECEIVED**

**Feb 08 2022**

**SC Court of Appeals**

**STATE OF SOUTH CAROLINA  
In the Court of Appeals**

---

APPEAL FROM CHARLESTON COUNTY  
Honorable Kristi Lea Harrington, Circuit Court Judge

---

Appellate Case Number: 2018-001269

---

THE STATE.....*Respondent,*

v.

KENNETH LAMONT ROBINSON, JR. ....*Appellant.*

---

**MOTION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF**

---

Pursuant to Rule 213 of the South Carolina Appellate Court Rules, Justice 360 respectfully submits this Motion for Leave to File a Brief of *Amicus Curiae* for Petitioner Kenneth Lamont Robinson, Jr.

**STATEMENT OF INTEREST OF *AMICUS CURIAE***

Justice 360 is a nonprofit organization based in Columbia, South Carolina, whose mission is to promote fair and just process for people accused of serious offenses. As part of that mission, Justice 360 attorneys represent juvenile clients in criminal proceedings in South Carolina and have been involved in litigation and criminal justice reform efforts on behalf of juvenile clients since the Supreme Court of the United States’ decision in *Miller v. Alabama*.

Justice 360 is currently involved in individual cases involving juvenile clients facing life without parole and sentences that are the functional equivalent of life without parole. Additionally, Justice 360 is involved in gathering data, developing training materials, and serving as resource counsel to court-appointed counsel in cases where juveniles have been sentenced to life without parole or other similar punishments, or who are potentially at risk of being sentenced to life without parole or a functional equivalent. Accordingly, Justice 360 has a vested interest in promoting a legal system in South Carolina that takes account of academic and scientific research regarding juvenile sentencing and that protects the interests of juvenile offenders in the State.

WHEREFORE, Justice 360 respectfully moves this Court for leave to file its *amicus* brief on these issues.

Respectfully Submitted,

Lindsey S. Vann  
Hannah Freedman  
Brendan Van Winkle  
Allison Franz  
Gabriela Markolovic  
JUSTICE 360  
900 Elmwood Ave., Ste. 200  
Columbia, SC 29201  
(803) 765-1044

By: s/Allison Franz  
**Counsel for Amicus Curiae**

February 8, 2022