

**THIS OPINION HAS NO PRECEDENTIAL VALUE. IT SHOULD NOT BE  
CITED OR RELIED ON AS PRECEDENT IN ANY PROCEEDING  
EXCEPT AS PROVIDED BY RULE 268(d)(2), SCACR.**

**THE STATE OF SOUTH CAROLINA  
In The Supreme Court**

The State, Respondent,

v.

Tiffany Ann Sanders, Appellant.

Appellate Case No. 2020-001390

---

Appeal from Dorchester County  
Diane Schafer Goodstein, Circuit Court Judge

---

Memorandum Opinion No. 2022-MO-004  
Heard February 3, 2022 – Filed February 23, 2022

---

**DISMISSED AS IMPROVIDENTLY GRANTED**

---

Elizabeth Franklin-Best, of Elizabeth Franklin-Best, P.C.,  
of Columbia, for Petitioner.

Attorney General Alan Wilson, Deputy Attorney General  
Donald J. Zelenka, Senior Assistant Deputy Attorney  
General Melody J. Brown, and Assistant Attorney  
General W. Joseph Maye, of Columbia, and David M.  
Pascoe Jr., of Orangeburg, for Respondent.

---

**PER CURIAM:** We issued a writ of certiorari to review the court of appeals' decision in *State v. Sanders*, Op. No. 2020-UP-237 (S.C. Ct. App. filed Aug. 12, 2020). We now dismiss as improvidently granted.<sup>1</sup>

**DISMISSED AS IMPROVIDENTLY GRANTED.**

**BEATTY, C.J., KITTREDGE, HEARN, FEW, JJ., and Acting Justice H. Bruce Williams, concur.**

---

<sup>1</sup> This disposition is without prejudice to further rights and remedies that may be available to Petitioner as provided by law.