

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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S.C. SUPREME COURT

Certiorari to the Court of Appeals
Appeal from Allendale County
Honorable R. Lawton McIntosh, Circuit Court Judge

Opinion No. 5824 (S.C. Ct. App. filed June 16, 2021)
Lower Court Case No. 2015-GS-03-0050

THE STATE.....*Respondent,*

v.

ROBERT LEE MILLER, III.*Petitioner.*

MOTION FOR LEAVE TO FILE *AMICI CURIAE* BRIEF

Pursuant to Rule 213 of the South Carolina Appellate Court Rules, Justice 360 and Cornell Juvenile Justice Project respectfully submit this Motion for Leave to File a Brief of *Amici Curiae* for Petitioner Robert Lee Miller, III.

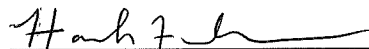
STATEMENT OF INTEREST OF *AMICI CURIAE*

Amici are advocates and academics who work on behalf of juveniles in South Carolina. The Cornell Juvenile Justice Project is an outgrowth of the Cornell Death Penalty Project, which is a program housed at Cornell Law School in Ithaca, New York. Over the last twenty years, the Death Penalty and Juvenile Justice Projects have been actively involved in academic research, legislative reform efforts, and individual case representation in South Carolina and other

jurisdictions. 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 and the Death Penalty and Juvenile Justice Projects are currently involved in individual cases involving juvenile clients, including those with low intellectual functioning, who have been subject to police interrogation. Accordingly, *amici* have a vested interest in promoting a legal system in South Carolina that takes account of academic and scientific research regarding juvenile interrogation and protects the interests of juvenile offenders in the State.

WHEREFORE, Justice 360 and Cornell Juvenile Justice Project respectfully move this Court for leave to file its *amici* brief on these issues.



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April 4, 2022