

TO: THE DEFENDANT AND HIS ATTORNEY, D. ASHLEY PENNINGTON, SOLICITOR SCARLET A. WILSON, JAY BENDER, ESQUIRE, TAYLOR M. SMITH, IV, ESQUIRE, WILLIAM F. NETTLES, ESQUIRE, ANN B. WALSH, ESQUIRE, JULIUS N. RICHARDSON, ESQUIRE, NATHAN S. WILLIAMS, ESQUIRE, S. BOYD YOUNG, ESQUIRE, WILLIAM MCGUIRE, ESQUIRE, AND ROSALYN W. FRIERSON, ESQUIRE,

YOU WILL PLEASE TAKE NOTICE THAT, Ronnie A. Sabb, Esquire, as counsel for and on behalf of Daniel Simmons, Jr., Personal Representative of the Estate of Rev. Dr. Daniel Simmons, Sr., a victim of the mass killings allegedly committed by Dylann S. Roof, will move before the Honorable J. C. Nicholson, Jr., Circuit Court Judge, Ninth Judicial Circuit on the tenth (10th) day after service hereof, or as soon before or thereafter as counsel may be heard, for an order to extend the temporary protection order issued by this court on July 10, 2015 and July 17, 2015 restraining law enforcement officials associated with this case from releasing materials related to the prosecution of Dylann S. Roof.

This Motion is based upon the pleadings, motions, affidavits, memoranda, prior findings of this Court, as well as any and all information and material that may be presented at a hearing on this matter.

Respectfully Submitted,

Ronnie A. Sabb

Kimberly V. Barr

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JULIE J. ARMSTRONG
CLERK OF COURT