IN THE SUPREME COURT
STATE OF GEORGIA

CASE №.: S25A0023

AARON LEWIS,
Appellant

v.

STATE OF GEORGIA,
Appellee

BRIEF OF APPELLEE (DISTRICT ATTORNEY)

PATSY AUSTIN-GATSON,
DISTRICT ATTORNEY,
GWINNETT JUDICIAL CIRCUIT
GEORGIA BAR № 028830

CLIFFORD L. KURLANDER,
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PART I. RELEVANT FACTS

Procedural History

Appellee accepts the procedural history of the case as related in Appellant's Brief to the extent it does not conflict with the record or with the facts as stated herein. (See Appellant's Br. 1–8). The Court extended the filing deadline for the Brief of Appellee to October 11, 2024. (See attached extension orders). Appellee now submits this timely brief.

Statement of Facts

The State notes the following pertinent facts to correct, clarify, or supplement Appellant's statement of facts:

The Indictment

The challenged felony-murder counts follow the same basic format:

> THE GRAND JURORS … charge and accuse [Appellant] "with the offense of FELONY MURDER (O.C.G.A. 16-5-1(c)), for that the said accused, **in the County and State aforesaid**, [on or between listed dates], did commit the offense of murder when **the accused caused the death of [the victim], a human being, irrespective of malice while in the commission of a felony, to wit: the sale and distribution of [fentanyl or heroin] in violation of O.C.G.A. 16-13-30(b), by selling [the victim], in Dekalb County, heroin that contained fentanyl which caused [the victim] to overdose and die in Gwinnett County**, contrary to the laws of said State, the good order, peace and dignity thereof.

(V1-17–19) (See Counts 1, 2, 5, and 6) (emphasis added).

The "County and State aforesaid" text is a reference to the indictment's earlier statements indicating the state and county of prosecution, including the notation, "STATE OF GEORGIA, COUNTY OF GWINNETT," at the top of the indictment's second page. (V1-17).

Corrections and Clarifications

Appellant writes, "According to the indictment, [Appellant] caused the deaths by unknowingly selling heroin containing fentanyl." (Appellant's Br. 15). However, the indictment alleges that Appellant sold heroin containing fentanyl "irrespective of malice," reflecting the text of OCGA § 16-5-1(c), not "unknowingly." (V1-17–19).

Appellant writes, "The State conceded in argument that the sale of heroin here was not a continuing offense." (Appellant's Br. 21, n.33). However, the prosecutor only noted that he was not relying on that argument at the hearing, instead arguing that Appellant's conduct caused the deaths since the overdoses were reasonably foreseeable.[1]

Appellant correctly notes that "there were no express stipulations of fact by the parties," despite the trial court's finding that "the parties agree" the drug sales occurred in DeKalb County. (Appellant's Br. 7). In any event, to the extent that any of the State's prior statements could be

[1] See V2-80, ln. 4–11 (Prosecutor: "I'm not arguing particularly that it was a continuing felony or anything along those lines but that, in fact, it is reasonably foreseeable and in this case, the sale of the narcotics it is reasonably foreseeable that an individual is going to ingest said narcotics and it is reasonably foreseeable, especially, if you're selling fentanyl that there will be overdose involved").

construed as stipulations, concessions, or admissions concerning the issues before this Court, Appellee clarifies that such statements constitute, at most, limited "concessions-for-the-sake-of-argument" not express stipulations. See *State v. Williams*, 306 Ga. 50, 54 (2019).

PART II. QUESTIONS PRESENTED / AREAS OF CONCERN

1. When a defendant is charged with felony murder predicated on the sale or distribution of drugs and his conduct underlying the predicate felony is alleged to have been completed in one county, but the death by drug overdose allegedly caused in the commission of that felony occurs in another county, what is the "cause of death"? O.C.G.A. § 17-2-2 (c). For example, is the "cause of death" the defendant's alleged affirmative conduct (the sale of drugs), the apparent immediate cause of death (drug overdose), either of those things, both of those things, or something else?

2. Under the above circumstances, in which county or counties was the "cause of death" "inflicted?" See id.

3. Under the above circumstances, could venue be proper in both counties?

PART III. ARGUMENT AND CITATION OF AUTHORITY

As this Brief will show below, the law enables a jury to find that venue is proper in Gwinnett County, the indictment sufficiently alleges venue in Gwinnett County, and Appellant cannot admit to the indictment's allegations without conceding guilt and venue in Gwinnett County. Accordingly, this Court should hold that the trial court properly denied Appellant's motion to dismiss and general demurrer.

As this Court has reiterated, OCGA § 17-2-2(c) "establishes, as a matter of law, that venue in homicide cases exists where certain events occurred. It does not dictate the county in which a jury must find these events occurred, and thereby the county in which venue lies." *Shelton v. Lee*, 299 Ga. 350, 354 (2016).

Subsection (c) of the venue statute sets forth a three-step, conditional process for determining venue in a homicide case. **First**, the jury makes the factual finding, from the evidence at trial, of "the county in which the cause of death was inflicted"; once found, the homicide "shall be considered," as a matter of law, as having been committed there. **Second**, if the jury cannot readily determine where the cause of death was inflicted, the statute directs the jury to make the factual finding of where the death occurred; once found, the homicide "shall be considered," as a matter of law, as having been committed there. **Third**, if the jury cannot readily determine the county where the cause of death was

inflicted or the county in which the death occurred, the jury makes the factual finding of the county in which the dead body was discovered; once found, the homicide "shall be considered," as a matter of law, as having been committed there. *Shelton*, 299 Ga. at 354–55.

However, the homicide venue analysis does not end at OCGA § 17-2-2(c). Other subsections may apply, including subsection (h), which provides that if the jury cannot determine in what county a crime was committed, "it shall be considered to have been committed in any county in which the evidence shows beyond a reasonable doubt that it might have been committed." *Allaben v. State*, 315 Ga. 789, 795 (2023).

A person commits felony murder when "in the commission of a felony, he or she causes the death of another human being irrespective of malice." OCGA § 16-5-1(c). To prove felony murder, the State must show that the predicate felony (**1**) is inherently dangerous, such that its attendant circumstances necessarily create a foreseeable risk of death; (**2**) was the proximate cause of the death, in that the death actually happened in a way that was a reasonably foreseeable result of the criminal conduct; and (**3**) bears a close connection to the death such that it is "part of it in an actual or material sense" in time, place, and causal relation. *Eubanks v. State*, 317 Ga. 563, 568–73 (1) (a) (2023).

The Court clarified the murder causation analysis in *Melancon v. State*, S23G1128 (decided Sept. 17, 2024), where it distinguished

between the "cause in fact" and "legal cause" components. The defendant's conduct is a cause in fact of a death if it "played a substantial part in bringing about or actually causing the death — typically shown through evidence that the death would not have happened but for the defendant's conduct — or if the defendant's conduct materially accelerated the death." The conduct is a legal cause "if the death was reasonably foreseeable — that is, a probable or natural consequence of the criminal conduct according to ordinary and usual experience, not a merely possible result." *Id*. at 23–24.

The causation determination is "fact-intensive and demands mixed considerations of logic, common sense, justice, policy, and precedent, so questions of causation are generally left to the jury at trial." *Id*. at 24. However, this case reaches the Court on a pretrial motion to dismiss and general demurrer, which challenges the "legality, validity, and substance" of an indictment by asserting that the indictment is fatally defective and thus incapable of supporting that a crime was committed. *Smith v. State*, 313 Ga. 752, 758 (2) (b) (2022). This analysis assumes the truth of the indictment's allegations. *State v. Williams*, 306 Ga. 50, 53 (2019).

The Court has asked three questions reflecting the Court's broader concerns about how the law on felony murder and venue interact where the underlying conduct spanned more than one county. (See Part II, supra). In Section 1, Appellee provides direct answers to these questions.

In Section 2, Appellee responds to Appellant's claims and shows why this Court should affirm the trial court's denial of the general demurrer.

1. Answers to the Court's questions and concerns.

"Properly understood, OCGA § 17-2-2 simply establishes what facts or events are relevant to determining venue. The jury, however, still makes these factual findings." *Shelton v. Lee*, 299 Ga. 350, 354 (2016). See also *Melancon v. State*, S23G1128 (decided Sept. 17, 2024), slip op. at 24 ("questions of causation are generally left to the jury at trial").

1.1. Question #1: What is the cause of death? Answer: The fatal overdose by drug ingestion is "the cause of death," as that term is used in OCGA § 17-2-2(c) and by this Court.

Death may have multiple "but-for," contributory or accelerating causes, rather than a "sole" cause. *Melancon v. State*, S23G1128 (decided Sept. 17, 2024); *Treadaway v. State*, 308 Ga. 882, 884–85 (2020); *State v. Jackson*, 287 Ga. 646, 647 (2) (2010). OCGA § 17-2-2 does not limit the jury's fact-finding as to the cause of death. See *Shelton*, supra.

This Court has typically analyzed "cause of death" within the context of the "infliction," using the proximate-cause and in-the-commission analyses to determine where the accused "inflicted the cause of death." Where the Court has referred to "the cause of death" on its own, it has typically described "the cause of death" as the singular event ending the victim's life. See, e.g., *Tankersley v. State*, 261 Ga. 318, 322–23 (8) (1991)

and *Lee v. State*, 270 Ga. 798, 801 (1999) (both using causation and in-the-commission analyses to determine whether the jury could find that the defendant "inflicted the cause of death" in the county of prosecution, while referring to the actual cause of death as the final death-causing event). See also *Eubanks v. State*, 317 Ga. 563 (2023) (although analyzing sufficiency rather than venue, the Court described the "cause of death" as "heroin toxicity," later using proximate-cause and in-the-commission analyses to determine how the defendant inflicted the death).

The usage of "cause of death" in the statute and in this Court's decisions suggests that it constitutes the immediate, final cause of death, which here would be the fatal overdose from ingesting[2] the drugs that the accused sold or distributed. However, the causation and in-the-commission analyses would determine where the accused "inflicted" it for the purpose of applying OCGA § 17-2-2(c).

[2] "Overdose" implies ingestion. See OCGA § 16-13-5(a)(1) ("Drug overdose" means an acute condition, including, but not limited to, extreme physical illness, ... or death, resulting from the consumption or use of a controlled substance or dangerous drug by the distressed individual ... ") (emphasis added).

1.2. Question #2: In which county or counties did the defendant inflict the cause of death? Answer: He inflicted the cause of death in those counties where his conduct materially caused, contributed to, or accelerated the death through his commission of the predicate felony.

For felony murder, the extent to which the defendant's conduct in the commission of the predicate felony causes the death defines the connection between the affirmative acts and the homicide. See *Melancon* and *Eubanks*, supra. Applied to OCGA § 17-2-2(c), this principle enables the jury to find that the defendant "inflicted" the cause of death in those counties where the defendant, through his commission of the predicate felony, materially caused, contributed to, or accelerated the death.

This Court has held that a defendant can cause the victim's death in the commission of a felony even where the defendant completed the physical acts associated with the predicate felony at a different time and place from the death. See, e.g., *Chua v. State*, 289 Ga. 220 (2011) (upholding felony murder conviction where defendant's distribution of methadone "directly and materially contributed" to the victim's death by fatal ingestion days later); *Diamond v. State*, 267 Ga. 249 (1996) (upholding felony murder conviction where defendant fled from police after completing a burglary, and her vehicle collided with and killed the victims); *Larkin v. State*, 247 Ga. 586, 587 (1981) (upholding felony murder conviction where defendant stabbed the victim, and the victim died days later from a complication of surgery to re-stich the wound).

The Court has logically extended that principle to determining venue in cross-county felony murders, holding that the accused "inflicted" the "cause of death" in the county where the death occurred even though he had "completed" the predicate felony in a different county, as long as the evidence supports the causal connection between them. See, e.g., *Lee v. State*, 270 Ga. 798 (1999) (venue was proper for felony murder even though the predicate kidnapping was completed in a non-prosecuting county, since the kidnapping contributed to the later murder in the prosecuting county); *Bradley v. State*, 272 Ga. 740 (2000) (same). See also *Jones v. State*, 301 Ga. 1 (2017) (venue proper for murder even though the defendant might have fired his gun from outside of the county, since he "inflicted" the killing wounds on victims who were in the county).

Appellant attempts to distinguish *Lee* and *Bradley* by citing to the Court's reasoning in those cases that the victim was "under the continuous control of the defendant until she was killed," although kidnapping was completed in a different county. *Lee* at 801 (4); *Bradley* at 743. But this Court has never construed "continuous control" to be a literal requirement for felony murder. Rather, the idea that the predicate felony must have a "continuous" causal effect resulting in the victim's death is simply a restatement of felony murder's causation and in-the-commission requirements, indistinguishable from the rest of our jurisprudence analyzing the same. See, e.g., *Menzies v. State*, 304 Ga.

156, 161 (2018) (describing the proximate cause for felony murder as an "unbroken causative chain" between the predicate felony and the death).

In sum, the defendant "inflicted" the "cause of death" wherever the defendant's conduct materially caused, contributed to, or accelerated the death through his commission of the predicate felony, and this Court's cases show that this may enable venue in more than one county.

1.3. Question #3: Is venue proper in both counties? Answer: Yes, venue is proper in both the county of the defendant's initial affirmative conduct and the county where his conduct caused the death to happen.

That felony murder can span counties is a logical extension of the idea that a prior completed predicate felony can prove felony murder as long as the predicate and the homicide are "closely connected in point of time, place and causal relation." *Eubanks v. State*, 317 Ga. 563, 573 (2023) (quoting Wayne R. LaFave, 2 Subst. Crim. L. § 14.5 (f) (3d ed.)).

Accordingly, venue is proper in both the county of the initial affirmative conduct and the county in which the death resulting from that affirmative conduct occurs. See *Tankersley*, *Lee*, *Bradley*, and *Jones*, supra. As the Court warned in *Lee*, "[t]o hold otherwise would lead to the absurdity that ... he could not be charged with felony murder in either county." *Lee*, 270 Ga. at 801 (4).

The application of felony murder's causation and in-the-commission analyses to determining venue under OCGA § 17-2-2(c) carries with it an important limiting principle, which is evident from the Court's approach in *Tankersley*, *Lee*, *Bradley*, and *Jones*: to prove venue, there must be evidence that the defendant's felonious conduct (wherever that occurred) produced a reasonably foreseeable and contributory or accelerating effect *in the county of prosecution* on the subsequent death, such that the jury can find that "the cause of death was inflicted" there. Thus, subsection (c) would not enable venue in, for example, a county through which the defendant passed uneventfully before the crime, or a county where the events were too attenuated or unforeseeable to have any causal connection to the predicate felony.

2. Because the indictment sufficiently alleges all of the elements of felony murder and venue in Gwinnett County, the trial court properly denied Appellant's motion to dismiss and general demurrer.

Courts look to the four corners of the indictment in determining whether it withstands a general demurrer. *Stinson v. State*, 279 Ga. 177, 180 n.3 (2005). The general-demurrer analysis assumes the truth of the indictment's allegations. *State v. Williams*, 306 Ga. 50, 53 (2019).

Appellant disputes only whether the indictment sufficiently alleges venue.[3] For the reasons below, Appellant's claims fail.

2.1. The indictment is sufficient because it includes the elements of felony murder and alleges that Appellant committed the crime in Gwinnett County.

As a threshold matter, the indictment is sufficient to withstand a general demurrer because it alleges (1) all of felony murder's essential elements and (2) that Appellant committed the crime in Gwinnett County. Appellant cannot admit this without conceding guilt and venue in Gwinnett County. *Stinson v. State*, 279 Ga. 177, 179 (2005).

The indictment begins, "STATE OF GEORGIA, COUNTY OF GWINNETT." (V1-17). In each of the counts at issue, the indictment

[3] See Appellant's Br. 12 ("This appeal presents a limited question of law involving the sufficiency of an indictment in alleging venue. While issues of proximate cause and possible alternative venues naturally arise in considering this matter, those rabbits must not be chased.") and 20 n.31 ("For purposes of this appeal, however, we have to assume proximate cause as alleged.").

alleges that "in the County and State aforesaid"—a reference to the earlier statement placing venue generally in Georgia and Gwinnett County—Appellant committed "the offense of FELONY MURDER (O.C.G.A § 16-5-1(c))." (V1-17–19). It then alleges that Appellant committed murder when he caused the death of the victim, a human being, irrespective of malice, while in the commission of at least one predicate felony, which the indictment identifies by name and shows to be felonious by citing to the correct criminal statute. (V1-17–19).

Because Appellant cannot admit the allegation that he committed felony murder in Gwinnett County without conceding that he committed felony murder in Gwinnett County, the indictment is not defective. *State v. Williams*, 306 Ga. 50, 52 (2019).

2.2. The descriptive clause placing part of the predicate conduct in DeKalb County does not deprive Gwinnett County of venue.

Appellant argues that because language in a subsequent descriptive clause places part of Appellant's conduct in another county ("by selling [to the victim], in DeKalb County, heroin that contained fentanyl"), the indictment (1) fails to allege facts showing the that *predicate* felony's venue is in Gwinnett County, and (2) fails to allege any "saving" facts or statutory provisions as material averments in order to return venue to Gwinnett County. For the reasons below, these claims fail.

2.2.1. This claim is not properly before the Court.

The claim that the indictment is deficient because it fails to allege the elements of the *predicate* crimes is "in essence, a special demurrer." *Stinson v. State*, 279 Ga. 177, 180 (2005). Since Appellant did not argue or obtain a ruling on a special demurrer below, the issue is not properly before this Court. *McCabe v. State*, 319 Ga. 275, 284–85 (2024); *State v. Wyatt*, 295 Ga. 257, 259 n.3 (2014).

2.2.2. The descriptive clause does not render the allegation of venue impossible to prove in Gwinnett County, and the indictment need not allege any "saving" provision or fact in order to retain venue in Gwinnett County.

An indictment may be insufficient to withstand a general demurrer "where the details provided in each count actually *negate* the elements of the crimes charged," making it "legally impossible to commit the crimes in the way the State alleged in the indictment." *Powell v. State*, 318 Ga. 875, 882 (2024) (cleaned up) (emphasis in original).

Pretermitting whether the special-demurrer claims are preserved, the descriptive "selling" clause in Appellant's indictment does not "negate the elements" of felony murder[4] or make it "legally impossible" to commit the crimes as alleged.

[4] Although the State must prove venue beyond a reasonable doubt at trial, it is not an "element of the offense." *Moon v. State*, 312 Ga. 31, 36 n.4 (2021).

First, this Court has held that, even where the defendant completed the predicate felony in a different, non-prosecuting county, another county may still have venue to prosecute where the defendant's conduct in commission of a felony in a non-prosecuting county caused someone to die in the prosecuting county. See *Lee v. State*, 270 Ga. 798 (1999); *Bradley v. State*, 272 Ga. 740 (2000); *Jones v. State*, 301 Ga. 1 (2017). Even assuming arguendo that the "selling" clause places all of the predicate conduct in DeKalb County, that alone would not negate the allegation that Appellant committed the crime in Gwinnett County.

Second, the indictment conjunctively charges both sale of drugs *and distribution* of drugs as alternative predicate felony acts[5] under OCGA § 16-13-30(b). (V1-17–19). The indictment does not allege that the sale and the distribution are synonymous or that the act of "selling [to the victim], in DeKalb County" indicates the distribution completed in DeKalb County. Every part of the indictment other than "selling [to the victim], in DeKalb County" relates back to the earlier clause placing the acts in "in the County and State aforesaid"—Gwinnett County, Georgia. (V1-17–19). Thus, the indictment alleges that Appellant caused the victims' deaths in Gwinnett County while in the commission of, *inter alia*, the

[5] See *Smith v. State*, 313 Ga. 752, 755 (2022) (indictment may properly allege alternative predicate felonies in a single felony murder charge); *Cash v. State*, 297 Ga. 859, 861–62 (2) (2015) (indictment properly alleged alternative ways of committing the predicate felony for felony murder conjunctively).

distribution of fentanyl in Gwinnett County—which Appellant cannot admit without conceding his guilt of a crime in Gwinnett County.

Third, the allegation of venue in Gwinnett County enables the jury to find venue there by *any* applicable subsection in OCGA § 17-2-2, since there is no requirement to charge specific venue subsections as material averments. Appellant incorrectly asserts that the State must allege specific "saving" venue subsections as material averments, analogizing to the requirement for alleging exceptions to the statute of limitations (Appellant's Br. 24), but the law squarely contradicts Appellant on this point. As our courts have pointed out, OCGA § 17-2-2 does not relieve the State of its burden to prove venue but establishes ways for the jury to determine if it is proven. See *Short v. State*, 276 Ga. App. 340, 343 (1) (a) (2005) (rejecting claim that indictments must allege a specific venue basis under OCGA § 17-2-2, distinguishing from tolling exceptions to the statute of limitations); *Shelton v. Lee*, 299 Ga. 350, 354 (2016) (holding that "OCGA § 17-2-2 simply establishes what facts or events are relevant to determining venue," but the jury "still makes these factual findings").

Neither the State nor the jury must limit itself to only one venue subsection if another one applies, and this Court will sustain a conviction on venue grounds if any rational juror could find it beyond a reasonable

doubt after viewing the evidence most favorably to the prosecution.[6] *Martin v. McLaughlin*, 298 Ga. 44, 46 (2015).

Accordingly, the charges' plain text enables numerous other ways to prove venue, and none of them require specialized language alleging them as material averments. For example, if the sale and/or the distribution occurred near the county border or while in transit between the two counties, venue would be proper in Gwinnett under subsections (b), (e), and (h)—all without amending any part of indictment's text. Further, if Appellant conducted part or all of the sale transaction in DeKalb but completed the distribution by delivering the drugs in Gwinnett County—whether personally or through an accomplice[7]—the evidence would establish venue in Gwinnett County.

[6] In fact, the jury can find venue on any grounds that the evidence supports, regardless of whether either party anticipated or argued for that specific basis to apply. See, e.g., *Hernandez v. State*, 304 Ga. 895, 899 (2019) (uncertainty in witness's statements concerning where the cause of death was inflicted enabled the jury to find it "was not readily determinable" and therefore proper in the county where the body was found); *Cook v. State*, 273 Ga. 828, 830 (2001) (inconsistency in witness's statements concerning the location of the death enabled the jury to find that the county in which the cause of death was inflicted could not be "readily determined" and that venue was proper where the body was found under OCGA § 17-2-2(c) or, alternatively, in any county where it "might have been committed" under OCGA § 17-2-2(h)). See also *Raines v. State*, 304 Ga. 582 (2018) (evidence bag labels marked "County: Upson" and investigation by Upson County agent were sufficient to prove venue in Upson County, even though the State did not argue that at trial).

[7] See *Bowman v. State*, 317 Ga. 457, 460–61 (2) (a) (2023) ("as we have repeatedly held, the State need not charge or even argue a theory of party to a crime or conspiracy for a crime to be proven in that manner"). See also *Osborn v. State*, 161 Ga. App. 132 (1982) (where defendant provided marijuana in DeKalb County to someone he expected to sell it in Gwinnett County, the evidence proved venue for sale of marijuana in Gwinnett County "even though the defendant may never have entered that county").

Finally, assuming arguendo that the special-demurrer issues are preserved *and* that counts 1, 2, 5, and 6 need additional details to allege that the sale or the distribution extended into Gwinnett County, counts 3, 4, 7, and 8 provide those details by alleging that Appellant illegally used a communication facility to arrange and commit the sale and distribution to the victims in Gwinnett County, both as separate crimes and as predicates for felony murder. (V1-18–19). See *Sanders v. State*, 313 Ga. 191, 193 (3) (a) (2022) (holding that allegedly deficient counts of an indictment can survive a special demurrer where another count provides the missing details).

CONCLUSION

In sum, the law enables a jury to find that venue is proper in Gwinnett County, the indictment sufficiently alleges venue in Gwinnett County, and Appellant cannot admit to the indictment's allegations without conceding guilt and venue in Gwinnett County. This Court should therefore affirm the trial court's order denying Appellant's motion to dismiss and general demurrer.

This submission does not exceed Rule 20's word-count limit.

Respectfully submitted on October 11, 2024 by

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CERTIFICATE OF SERVICE

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I certify that there is a prior agreement with the above to allow documents in a PDF format sent via email to suffice for service.

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SUPREME COURT OF GEORGIA
Case No. S25A0023

August 27, 2024

AARON LEWIS v. THE STATE.

Your request for an extension of time to file the brief of appellee in the above case is granted in part. You are given an extension until October 7, 2024.

A copy of this order **MUST** be attached as an exhibit to the document for which the appellee received this extension.

SUPREME COURT OF THE STATE OF GEORGIA
Clerk's Office, Atlanta

I certify that the above is a true extract from the minutes of the Supreme Court of Georgia.

Witness my signature and the seal of said court hereto affixed the day and year last above written.

, Clerk

SUPREME COURT OF GEORGIA
Case No. S25A0023

October 1, 2024

AARON LEWIS v. THE STATE.

Your request for an extension of time to file the brief of appellee in the above case is granted until October 11, 2024. Counsel should expect no further extensions of time.

A copy of this order **MUST** be attached as an exhibit to the document for which the appellee received this extension.

SUPREME COURT OF THE STATE OF GEORGIA
Clerk's Office, Atlanta

I certify that the above is a true extract from the minutes of the Supreme Court of Georgia.

Witness my signature and the seal of said court hereto affixed the day and year last above written.

, Clerk