

March 20, 2020

The Honorable Scott S. Harris
Clerk of the Court
Supreme Court of the United States
One First Street, N.E.
Washington, D.C. 20543

**Re: *Bethany Austin v. State of Illinois,*
No. 19-1029**

Dear Mr. Harris:

I am counsel of record for Petitioner Bethany Austin in the above-referenced case. In the Petition for Certiorari filed on behalf of Ms. Austin, we cited the Minnesota Court of Appeals decision in *Minnesota v. Casillas*, 938 N.W.2d 74, 2019 WL 7042804 (Minn. App. 2019). This letter serves as supplemental authority to note that, in the time since the Petition for Certiorari was filed, the Supreme Court of Minnesota granted discretionary review of the Court of Appeals' decision. See *Minnesota v. Casillas*, No. A19-0576, Order (Minn. Mar. 17, 2020), available at file:///C:/Users/londr/Downloads/Order%20-%20PFR%20-%20Grant.pdf.

Sincerely,



Robert Corn-Revere

cc: Counsel for Respondents