SUPREME COURT OF SOUTH DAKOTA
SUMMARY DISPOSITIONS
SEPTEMER 2021

Pursuant to SDCL 15-26A-87.1(A), (B), (C), and (D), the Supreme Court may, sua sponte, enter an order or memorandum opinion summarily affirming or reversing the judgment or order of the trial court in actions wherein the criteria as required by those sections are clearly met. SDCL 15-26A-87.1 (E) provides that such summary dispositions may not be cited or relied upon as authority in any litigation in any court in South Dakota, except when the decision establishes the law of the case, res judicata or collateral estoppel, or in any criminal action or proceeding involving the same defendant or a disciplinary action or proceeding involving the same person.

TITLE	DOCKET NUMBER	DATE OF DECISION	DISPOSITION
In the Interest of J.L.	29501	9-21-2021	Affirmed (Connolly)