

From: Whittle, Amanda <Amanda.Whittle@dss.sc.gov>
To: Robin Owensrowens@sowellgray.com
CC: Catone, TonyTony.Catone@dss.sc.gov
Becky Laffitteblaffitte@sowellgray.com
Pisarik, HollyHolly.Pisarik@dss.sc.gov
Taylor, RicheleRicheleTaylor@gov.sc.gov
Date: 9/20/2016 8:28:25 PM
Subject: Re: Michelle H., et al. v. Haley, et al. - DEFENDANTS' REDLINED VERSION - 9/20/16

Yes, it is accurate to say that "over 10,195 who were sent notice."

The first affidavit said 10,179 were sent. That number included notices sent to our DSS offices.

The second affidavit added 2,700 mailouts as the "failsafe."

Thank you
Amanda

Amanda F. Whittle
Assistant General Counsel
Office of General Counsel
S.C. Dept. of Social Services
Post Office Box 1520
Columbia, SC 29202-1520
803-898-0776 telephone
803-898-7245 facsimile
803-917-1323 cellular

Robin Owens <rowens@sowellgray.com> wrote:

Yes. The 3,900 on page 19 was confirmed by Amanda. The number noted on page 14 (10,195) was not noted in Amanda's email. Is that number confirmed also?



ROBIN OWENS LEGAL ASSISTANT **VCARD**

1310 Gadsden Street | Columbia, SC 29201 | 803.231.7805
sowellgray.com

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From: Catone, Tony [mailto:Tony.Catone@dss.sc.gov]

Sent: Tuesday, September 20, 2016 5:03 PM

To: Robin Owens <rowens@sowellgray.com>; Becky Laffitte <blaffitte@sowellgray.com>; Whittle, Amanda <Amanda.Whittle@dss.sc.gov>; Pisarik, Holly <Holly.Pisarik@dss.sc.gov>; richeletaylor@gov.sc.gov

Subject: FW: Michelle H., et al. v. Haley, et al. - DEFENDANTS' REDLINED VERSION - 9/20/16

Robin,

This version still has comments that we are confirming certain numbers—I believe Amanda sent information earlier today that confirmed or updated those numbers...did you see that / incorporate it into the final?

Thanks,

Tony

Anthony S. H. Catone

General Counsel

South Carolina Department of Social Services

Office of General Counsel

P.O. Box 1520

Columbia, SC 29202-1520

Office Phone: (803) 898-7368

Fax: 803-898-7245

Email: tony.catone@dss.sc.gov

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From: Stephen Suggs [mailto:SSuggs@scjustice.org]

Sent: Tuesday, September 20, 2016 4:31 PM

To: Robin Owens <rowens@sowellgray.com>; Becky Laffitte <blaffitte@sowellgray.com>; Sue Berkowitz <SBerk@scjustice.org>; Matthew T. Richardson <MRichardson@wyche.com>; ilustbader@childrensrights.org; Christina Remlin <cremlin@childrensrights.org>; Kate Wood <kwood@childrensrights.org>

Cc: Monty Todd <mtodd@sowellgray.com>; Carenn Moore <cmoore@sowellgray.com>; Catone, Tony <Tony.Catone@dss.sc.gov>; Whittle, Amanda <Amanda.Whittle@dss.sc.gov>; holly@pisariklawfirm.com; richeletaylor@gov.sc.gov; Butch Bowers <Butch@ButchBowers.com>

Subject: Re: Michelle H., et al. v. Haley, et al. - DEFENDANTS' REDLINED VERSION - 9/20/16

Attached hereto please find a version of the document containing your redlined changes (including those from your email at 4:08) as well as some redlined changes by the plaintiffs. Many are clean up changes such as adjusting the exhibit numbers but some reflect changes in response to your redlines.

Please review and accept any changes you agree with.

Thank you

Steve



Stephen R. Suggs
Deputy Director
SC Appleseed Legal Justice Center
(803) 779-1113 ext. 106
<http://www.scjustice.org>

From: Robin Owens <rowens@sowellgray.com>
Date: Tuesday, September 20, 2016 at 4:08 PM
To: Becky Laffitte <blaffitte@sowellgray.com>, Stephen Suggs <SSuggs@scjustice.org>, Sue Berkowitz <SBerk@scjustice.org>, Matthew Richardson <MRichardson@wyche.com>, "ILustbader@childrensrights.org" <ilustbader@childrensrights.org>, Christina Remlin <cremlin@childrensrights.org>, Kate Wood <kwood@childrensrights.org>
Cc: Monty Todd <mtodd@sowellgray.com>, Carenn Moore <cmoore@sowellgray.com>, "Catone, Tony" <Tony.Catone@dss.sc.gov>, "Whittle, Amanda" <Amanda.Whittle@dss.sc.gov>, "holly@pisariklawfirm.com" <holly@pisariklawfirm.com>, "richeletaylor@gov.sc.gov" <richeletaylor@gov.sc.gov>, "butch@butchbowers.com" <Butch@ButchBowers.com>
Subject: RE: Michelle H., et al. v. Haley, et al. - DEFENDANTS' REDLINED VERSION - 9/20/16

Steve – attached please find the Joint Motion from the defense team with redlined revisions. Thanks.

Robin O.



ROBIN OWENS LEGAL ASSISTANT **VCARD**

1310 Gadsden Street | Columbia, SC 29201 | 803.231.7805
sowellgray.com

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From: Becky Laffitte
Sent: Monday, September 19, 2016 4:44 PM
To: Stephen Suggs <SSuggs@scjustice.org>; Sue Berkowitz <SBerk@scjustice.org>; Matthew T. Richardson <MRichardson@wyche.com>; ilustbader@childrensrights.org; Christina Remlin <cremlin@childrensrights.org>; Kate Wood <kwood@childrensrights.org>
Cc: Monty Todd <mtodd@sowellgray.com>; Robin Owens <rowens@sowellgray.com>; Carenn Moore <cmoore@sowellgray.com>; Catone, Tony <Tony.Catone@dss.sc.gov>; Whittle, Amanda <Amanda.Whittle@dss.sc.gov>; holly@pisariklawfirm.com; richeletaylor@gov.sc.gov; Butch Bowers <Butch@ButchBowers.com>; Becky Laffitte <blaffitte@sowellgray.com>
Subject: RE: Michelle H., et al. v. Haley, et al. - DEFENDANTS' REDLINED VERSION - 9/19/16 ***** URGENT SENT REDLINE VERSION PREMATURELY *****
Importance: High

Stephen and All:

MY error...I failed to circulate the red-lined changes to the DEFENSE team for review and approval as I agreed to do.

Therefore, there may be additional changes and comments after their review. Carenn will be out on vacation the remainder of the week and I simply jumped the gun. Again, my apologies...any additional changes will be circulated upon receipt. Becky

From: Becky Laffitte

Sent: Monday, September 19, 2016 4:09 PM

To: Stephen Suggs <SSuggs@scjustice.org>; Sue Berkowitz <SBerk@scjustice.org>; Matthew T. Richardson <MRichardson@wyche.com>; ilustbader@childrensrights.org; Christina Remlin <cremlin@childrensrights.org>; Kate Wood <kwood@childrensrights.org>

Cc: Monty Todd <mtodd@sowellgray.com>; Becky Laffitte <blaffitte@sowellgray.com>; Robin Owens <rowens@sowellgray.com>; Carenn Moore <cmoore@sowellgray.com>; Catone, Tony <Tony.Catone@dss.sc.gov>; Whittle, Amanda <Amanda.Whittle@dss.sc.gov>; holly@pisariklawfirm.com; richeletaylor@gov.sc.gov; Butch Bowers <Butch@ButchBowers.com>

Subject: Michelle H., et al. v. Haley, et al. - DEFENDANTS' REDLINED VERSION - 9/19/16

Good afternoon, Stephen and all. Following a conference call with the defense team this afternoon, we are submitting a redlined version of suggested changes to the Joint Motion/Memo for Final Approval of Class Action Settlement.

Given the hours we spent in jointly selecting and agreeing to words to be used in the Consent Interim Agreement and proposed Settlement Agreement, we would respectfully request that the specific provisions be recited rather than summarized when reference is made in the Joint Motion/Memo.

We are checking the numbers in the document and will verify the accuracy as soon as possible. Thank you for allowing us an opportunity to review and comment. Have a nice afternoon.

Becky

BECKY LAFFITTE MEMBER **VCARD**

1310 Gadsden Street | Columbia, SC 29201 | 803.231.7831
sowellgray.com

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