

From: Pisarik, Holly

To: Matthew T. Richardson <MRichardson@wyche.com>

Butch Bowers <Butch@ButchBowers.com>

blaffitte@sowellgray.com <blaffitte@sowellgray.com>

mtodd@sowellgray.com <mtodd@sowellgray.com>

Tony.Catone@dss.sc.gov <Tony.Catone@dss.sc.gov>

Amanda.Whittle@dss.sc.gov <Amanda.Whittle@dss.sc.gov>

Date: 6/2/2016 3:02:12 PM

Subject: Arbitration Agreement

Attachments: Arbitration Agreement.docx

---

Thanks for confirming that the payment schedule will be contained in the arbitration order. We have drafted the attached arbitration agreement to be signed only by the attorneys to send to Judge Duffy to memorialize our understanding of the arbitration terms. Thanks, Holly

---

From: Matthew T. Richardson [mailto:MRichardson@wyche.com]

Sent: Thursday, June 02, 2016 2:52 PM

To: Butch Bowers; Pisarik, Holly; blaffitte@sowellgray.com; mtodd@sowellgray.com; Tony.Catone@dss.sc.gov; Amanda.Whittle@dss.sc.gov

Subject: RE:

Thank you very much. I have been chairing an Access to Justice Commission meeting for the last 2 hours and have not read it yet. I will be back in my office in 15 minutes. I can confirm number 2 and appreciate all your help. Thanks, Matthew

----- Original message -----

From: Butch Bowers <Butch@ButchBowers.com>

Date: 6/2/16 12:33 PM (GMT-05:00)

To: "Matthew T. Richardson" <MRichardson@wyche.com>, HollyPisarik@gov.sc.gov, blaffitte@sowellgray.com, mtodd@sowellgray.com, Tony.Catone@dss.sc.gov, Amanda.Whittle@dss.sc.gov

Subject:

---

This e-mail may contain privileged or confidential information.

If the e-mail was not intended for you, please:

(i) delete the e-mails and any attachments

(ii) destroy any copies that may have been made

(iii) do not use, copy or distribute the contents in any form

(iv) notify the sender by return e-mail or by calling 864-242-8200.

No privilege is waived by inadvertent transmission.

Thank you.

---

Matthew - I hope this finds you well. We have a couple of housekeeping items to take care of to finalize things:

1- There are a few items that the parties agreed to in the 3/24 version of the Settlement Agreement that were not included in your 6/1 draft. by separate email, Holly will send you your 6/1 draft with these additions.

2- We spoke about Plaintiffs desire to keep the parties agreed upon payment schedule for attorney's fees out of the Settlement Agreement. Obviously, it's important for Defendants to memorialize the agreed upon schedule. It's my assumption that Judge Duffy will include the payment schedule in the arbitration order. we may have already discussed this and I just don't recall, but please confirm.

3- After we get a copy of the Settlement Agreement that incorporates the negotiated additions discussed above and we have an understanding about memorializing the payment schedule, we will move forward with signatures and can get them over to you asap. With

the last day of session, the Governor and her staff are obviously busy, but we will make this a priority.

4- We'll look for your press statements later this afternoon, and we will share our proposed media release with you as soon as we can. I'm tied up in meetings in DC the rest of the afternoon, so please reply to all for timely responses from us. Thanks,

Butch