

From: Robin Owens <rowens@sowellgray.com>

To: Becky Laffitteblaffitte@sowellgray.com

Stephen SuggsSSuggs@scjustice.org

Sue BerkowitzSBerk@scjustice.org

Matthew T. RichardsonMRichardson@wyche.com

ilustbader@childrensrights.orgilustbader@childrensrights.org

Christina Remlincremlin@childrensrights.org

Kate Woodkwood@childrensrights.org

CC: Monty Toddmtdodd@sowellgray.com

Carenn Moorecmoore@sowellgray.com

Catone, TonyTony.Catone@dss.sc.gov

Whittle, AmandaAmanda.Whittle@dss.sc.gov

holly@pisariklawfirm.comholly@pisariklawfirm.com

Taylor, RicheleRicheleTaylor@gov.sc.gov

Butch BowersButch@ButchBowers.com

Date: 9/20/2016 4:08:05 PM

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

Attachments: 6734-1500 JOINT MOTION AND MEMORANDUM IN SUPPORT OF JOINT (A0941591xA08D7).docx

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

NOTICE: This e-mail and any files transmitted with it are confidential and may contain information which is legally privileged or otherwise exempt from disclosure. They are intended solely for the use of the individual or entity to whom this e-mail is addressed. If you are not one of the named recipients or otherwise have reason to believe that you have received this message in error, please immediately notify the sender and delete this message immediately from your computer. Any other use, retention, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.

IRS DISCLAIMER: As required by U.S. Treasury Regulations governing tax practice, you are hereby advised that any written tax advice contained herein was not written or intended to be used (and cannot be used) by any taxpayer for the purpose of avoiding penalties that may be imposed under the Internal Revenue Code.

SUPPORTING GREEN. PLEASE PRINT WISELY.

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

NOTICE: This e-mail and any files transmitted with it are confidential and may contain information which is legally privileged or otherwise exempt from disclosure. They are intended solely for the use of the individual or entity to whom this e-mail is addressed. If you are not one of the named recipients or otherwise have reason to believe that you have received this message in error, please immediately notify the sender and delete this message immediately from your computer. Any other use, retention, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.

IRS DISCLAIMER: As required by U.S. Treasury Regulations governing tax practice, you are hereby advised that any written tax advice contained herein was not written or intended to be used (and cannot be used) by any taxpayer for the purpose of avoiding penalties that may be imposed under the Internal Revenue Code.

SUPPORTING GREEN. PLEASE PRINT WISELY.