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Date: 9/20/2016 5:12:00 PM

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

Attachments: image001.png  
image002.png

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Tony

Robin sent the changes....however we cannot tell (without re-reading both documents) if Stephen accepted the changes. We have concerns because Robin deleted Alex Davis' name and it is on the version Stephen returned. I am just leaving depositions in Anderson. Think we all need to review and conference tomorrow. B

Sent from my iPad

On Sep 20, 2016, at 5:03 PM, Catone, Tony <Tony.Catone@dss.sc.gov> wrote:

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

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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](mailto:rowens@sowellgray.com)>; Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>; Sue Berkowitz <[SBerk@scjustice.org](mailto:SBerk@scjustice.org)>; Matthew T. Richardson <[MRichardson@wyche.com](mailto:MRichardson@wyche.com)>; [ilustbader@childrensrights.org](mailto:ilustbader@childrensrights.org); Christina Remlin <[cremlin@childrensrights.org](mailto:cremlin@childrensrights.org)>; Kate Wood <[kwood@childrensrights.org](mailto:kwood@childrensrights.org)>

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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

<image001.png>  
Stephen R. Suggs  
Deputy Director  
SC Appleseed Legal Justice Center  
(803) 779-1113 ext. 106  
<http://www.scjustice.org>

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From: Robin Owens <[rowens@sowellgray.com](mailto:rowens@sowellgray.com)>

Date: Tuesday, September 20, 2016 at 4:08 PM

To: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>, Stephen Suggs <[SSuggs@scjustice.org](mailto:SSuggs@scjustice.org)>, Sue Berkowitz <[SBerk@scjustice.org](mailto:SBerk@scjustice.org)>, Matthew Richardson <[MRichardson@wyche.com](mailto:MRichardson@wyche.com)>, "[ilustbader@childrensrights.org](mailto:ilustbader@childrensrights.org)" <[ilustbader@childrensrights.org](mailto:ilustbader@childrensrights.org)>, Christina Remlin <[cremlin@childrensrights.org](mailto:cremlin@childrensrights.org)>, Kate Wood <[kwood@childrensrights.org](mailto:kwood@childrensrights.org)>

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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.

<image002.png>

ROBIN OWENS LEGAL ASSISTANT **VCARD**

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From: Becky Laffitte  
Sent: Monday, September 19, 2016 4:44 PM  
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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:

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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

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From: Becky Laffitte  
Sent: Monday, September 19, 2016 4:09 PM  
To: Stephen Suggs <[SSuggs@scjustice.org](mailto:SSuggs@scjustice.org)>; Sue Berkowitz <[SBerk@scjustice.org](mailto:SBerk@scjustice.org)>; Matthew T. Richardson <[MRichardson@wyche.com](mailto:MRichardson@wyche.com)>; [ilustbader@childrensrights.org](mailto:ilustbader@childrensrights.org); Christina Remlin <[cremlin@childrensrights.org](mailto:cremlin@childrensrights.org)>; Kate Wood <[kwood@childrensrights.org](mailto:kwood@childrensrights.org)>  
Cc: Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>; Robin Owens <[rowens@sowellgray.com](mailto:rowens@sowellgray.com)>; Carenn Moore <[cmoore@sowellgray.com](mailto:cmoore@sowellgray.com)>; Catone, Tony <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)>; Whittle, Amanda <[Amanda.Whittle@dss.sc.gov](mailto:Amanda.Whittle@dss.sc.gov)>; [holly@pisariklawfirm.com](mailto:holly@pisariklawfirm.com); [richeletaylor@gov.sc.gov](mailto:richeletaylor@gov.sc.gov); Butch Bowers <[Butch@ButchBowers.com](mailto: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**

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