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Becky Laffitteblaffitte@sowellgray.com
Date: 9/18/2016 12:52:51 PM
Subject: RE: Michelle H. v. Haley: Email submissions and Prep for Final Hearing September 18

Good afternoon, Stephen:

My apologies to all for sending this email on Sunday. However, I will be out of town in depositions tomorrow morning and wanted to advise you that the defense team is conferencing at 2:00 pm tomorrow afternoon to discuss the proposed joint motion/memo for final approval of the Class Action Settlement Agreement. We'll contact you after our meeting if any revisions are requested for your consideration. Have a great afternoon. Best, Becky

From: Stephen Suggs [mailto:SSuggs@scjustice.org]
Sent: Wednesday, September 14, 2016 6:50 PM
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Cc: Monty Todd <mtodd@sowellgray.com>; richeletaylor@gov.sc.gov; holly@pisariklawfirm.com
Subject: Re: Michelle H. v. Haley: Email submissions and Prep for Final Hearing September 13

Good afternoon,

Attached hereto please find the Plaintiffs proposed Memorandum in Support of Joint Motion for Final Approval of Class Action Settlement Agreement. This version contains multiple references to attached exhibits that we have not forwarded with the document because we believe you have all the documents referenced and they are voluminous.

We would also propose that on Monday September 19, 2016 we forward all correspondence received regarding the Settlement to Judge Gergel at his ECF address using the following convention.

- (1) Apparent Attorney-Client Confidential Communication—provided to the Court but not provided to Defendants and recommended not to be filed publicly,
- (2) Personal and Confidential Information Included—provided to Court and defendants but recommended not to be filed publicly,
- (3) Irrelevant to Settlement Agreement and Approval—provided to Court and defendants but not to be filed publicly,

and
(4) Cited, Discussed, and Attached to Joint Motion for Final Approval to be filed tomorrow.

We will create folders with these names and put the appropriate letters into each folder and then send them via email. This is why in several places in the Memorandum we have cited using this convention.

We believe that we should file it no later than September 20, 2016 in order to give Judge Gergel ample time to review.

Thank you,

Steve



Stephen R. Suggs
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