

From: Taylor, Richele
To: Butch Bowers <Butch@ButchBowers.com>
Date: 12/30/2016 7:06:51 PM
Subject: RE: Draft Answer Tom Davis

Butch –

Good point. I will revise the sentence as I think you are accurate if we are truly neutral. I will also fix the signature block.

I plan to re-read this weekend to ensure I have the cites and everything ready to go, and then I will get it filed/served Tuesday. If you will be around I can swing by for your signature.

Thanks,

Richele

Richele K. Taylor
Chief Legal Counsel
Office of the Governor
O: 803-734-8465
C: 803-231-9763

From: Butch Bowers [mailto:Butch@ButchBowers.com]
Sent: Friday, December 30, 2016 4:23 PM
To: Taylor, Richele <RicheleTaylor@gov.sc.gov>
Subject: RE: Draft Answer Tom Davis

Richele – I think it looks great. I only have a couple of minor comments.

Substantively, in the last sentence of both the return and the memo in support, we say “Instead, Governor Haley relies on the Court’s discretion as to whether it has original jurisdiction over the issues expressed in the Petition.” Do we want to go one step further and extend that sentence to say something like “and if so, what the appropriate resolution of those issues should be.” It seems to me that if we are going to be truly neutral, that neutrality extends to both the issue of original jurisdiction and the underlying merits of the case, and it would make sense to go ahead and point that out. Let me know what you think about that.

Technically, my signature block should contain my full “real” name, which is Karl S. Bowers, Jr.; the full name of my firm, which includes LLC at the end; and my SC Bar number is 16141. So our joint signature block should look like the one pasted below. Otherwise, I don’t have any additional revisions or comments. Great work – thanks very much.

Butch

By: _____
Bowers Law Office LLC
Karl S. Bowers, Jr.
S.C. Bar No.: 16141
1419 Pendleton St., Columbia, SC 29201
Office of the Governor, Chief Legal Counsel
Richele K. Taylor
S.C. Bar No.: 70493

1205 Pendleton St., Columbia, SC 29201
Attorneys for Respondent Nikki R. Haley

From: Taylor, Richele [<mailto:RicheleTaylor@gov.sc.gov>]
Sent: Friday, December 30, 2016 12:40 PM
To: Butch Bowers <Butch@ButchBowers.com>
Subject: Draft Answer Tom Davis

Butch,

Attached is the draft answer. Please add to, take away, tweak to your liking. Call me if you want to discuss or you see another angle that we should include.

Richele