

From: Becky Laffitte <blaffitte@sowellgray.com>
To: Whittle, Amanda Amanda.Whittle@dss.sc.gov
CC: Catone, Tony Tony.Catone@dss.sc.gov
holly@pisariklawfirm.com holly@pisariklawfirm.com
Butch Bowers Butch@ButchBowers.com
Taylor, Richele RicheleTaylor@gov.sc.gov
Robin Owens rowens@sowellgray.com
Monty Todd mtodd@sowellgray.com
Date: 9/21/2016 3:08:13 PM
Subject: RE: Message on Behalf of Becky Laffitte *** FW: Michelle H., et al. v. Haley, et al. - DEFENDANTS' REDLINED VERSION - 9/20/16

Amanda

We hope to have all the changes by 3:30..as they want to file today. Also, we only saw one change by Tony. Robin will incorporate this change into the redlined version of corrections. Look forward to hearing from Holly thanks B.

From: Whittle, Amanda [mailto:Amanda.Whittle@dss.sc.gov]
Sent: Wednesday, September 21, 2016 3:06 PM
To: Becky Laffitte <blaffitte@sowellgray.com>
Cc: Catone, Tony <Tony.Catone@dss.sc.gov>
Subject: FW: Message on Behalf of Becky Laffitte *** FW: Michelle H., et al. v. Haley, et al. - DEFENDANTS' REDLINED VERSION - 9/20/16
Importance: High

Becky,

Tony sent the attachment to everyone with a caveat that Holly is reviewing it and will respond soon.

Thank you,
Amanda

*Amanda F. Whittle
Assistant General Counsel
Office of General Counsel
S.C. Dept. of Social Services*

*Mailing address: Post Office Box 1520, Columbia, SC 29202-1520
Physical address: 1535 Confederate Avenue, Room 621, Columbia, SC 29202
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From: Catone, Tony
Sent: Wednesday, September 21, 2016 3:04 PM
To: Robin Owens <rowens@sowellgray.com>; Monty Todd <mtodd@sowellgray.com>; Whittle, Amanda <Amanda.Whittle@dss.sc.gov>; holly@pisariklawfirm.com; richeletaylor@gov.sc.gov; Butch Bowers <Butch@ButchBowers.com>; Pisarik, Holly <Holly.Pisarik@dss.sc.gov>
Subject: RE: Message on Behalf of Becky Laffitte *** FW: Michelle H., et al. v. Haley, et al. - DEFENDANTS' REDLINED VERSION - 9/20/16
Importance: High

All,

I have attached the document with one additional revision on page 4, where I have changed an introductory reference to group homes "failing" to align with the language used later in the argument section. Holly was giving this a final close review and she should send word shortly if she suggests any further revisions.

Thank you for your help,

Tony

Anthony S. H. Catone
General Counsel
South Carolina Department of Social Services

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From: Robin Owens [<mailto:rowens@sowellgray.com>]
Sent: Tuesday, September 20, 2016 5:07 PM
To: Monty Todd <mtodd@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: Message on Behalf of Becky Laffitte *** FW: Michelle H., et al. v. Haley, et al. - DEFENDANTS' REDLINED VERSION - 9/20/16

Team – Please carefully review the attached (which was sent late this afternoon to us by Steve Suggs) for the changes Steve made compared to our redlined version. Becky has been out of town in depositions all today and will be in a mediation in our office tomorrow. She can break away for a conference call regarding this if and when you all are available. Please advise. Thanks.

Robin Owens
Sowell Gray Stepp & Laffitte, LLC
1310 Gadsden Street
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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>; Becky Laffitte <blaffitte@sowellgray.com>; 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>; 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: 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



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

From: Robin Owens <rowens@sowellgray.com>
Date: Tuesday, September 20, 2016 at 4:08 PM
To: Becky Laffitte <blaffitte@sowellgray.com>, Stephen Suggs <SSuggs@scjustice.org>, Sue Berkowitz <SBerk@scjustice.org>, Matthew Richardson <MRichardson@wyche.com>, "ilustbader@childrensrights.org" <ilustbader@childrensrights.org>, Christina Remlin <cremlin@childrensrights.org>, Kate Wood <kwood@childrensrights.org>
Cc: Monty Todd <mtodd@sowellgray.com>, Carenn Moore <cmoore@sowellgray.com>, "Catone, Tony" <Tony.Catone@dss.sc.gov>, "Whittle, Amanda" <Amanda.Whittle@dss.sc.gov>, "holly@pisariklawfirm.com" <holly@pisariklawfirm.com>, "richeletaylor@gov.sc.gov" <richeletaylor@gov.sc.gov>, ""butch@butchbowers.com"" <Butch@ButchBowers.com>
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.



ROBIN OWENS LEGAL ASSISTANT **VCARD**

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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**

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