

From: Becky Laffitte <blaffitte@sowellgray.com>
To: Andy Barclayandy@fosteringcourtimprovement.org
Carenn Moorecarenn@sowellgray.com
CC: Justice Corriganjusticecorrigan@hotmail.com
Page WalleyPWalley@casey.org
Monty Toddmtodd@sowellgray.com
Michael Montgomerymmontgomery@sowellgray.com
Catone, TonyTony.Catone@dss.sc.gov
Davis, TaronTaron.Davis@dss.sc.gov
Butch BowersButch@ButchBowers.com
Pisarik, HollyHollyPisarik@gov.sc.gov
Shackelford, JohnJohn.Shackelford@dss.sc.gov
Date: 11/13/2015 4:38:34 PM
Subject: RE: Defendants Counter Proposals November 13

Thanks a million, Andy. Have a great weekend

From: Andy Barclay [mailto:andy@fosteringcourtimprovement.org]
Sent: Friday, November 13, 2015 4:23 PM
To: Becky Laffitte <blaffitte@sowellgray.com>; Carenn Moore <cmoore@sowellgray.com>
Cc: Justice Corrigan <justicecorrigan@hotmail.com>; Page Walley <PWalley@casey.org>; Monty Todd <mtodd@sowellgray.com>; Michael Montgomery <mmontgomery@sowellgray.com>; Catone, Tony <Tony.Catone@dss.sc.gov>; Davis, Taron <Taron.Davis@dss.sc.gov>; Butch Bowers <Butch@ButchBowers.com>; Pisarik, Holly <HollyPisarik@gov.sc.gov>; Shackelford, John <John.Shackelford@dss.sc.gov>
Subject: Re: Defendants Counter Proposals November 13

Hi Carenn,

Word doc with track changes attached. The sections in Investigations that need to come out completely are highlighted in purple. D1-D3 will need to be renumbered also.

Thanks,
Andy

Becky Laffitte wrote:

Andy

Please call Carenn 803.231.7831 If you make the changes your name will show on the document. We want to keep Carenn as the only name on the revisions. thanks

From: Andy Barclay [mailto:andy@fosteringcourtimprovement.org]
Sent: Friday, November 13, 2015 4:05 PM
To: Justice Corrigan <justicecorrigan@hotmail.com>; Carenn Moore <cmoore@sowellgray.com>
Cc: Becky Laffitte <blaffitte@sowellgray.com>; Page Walley <PWalley@casey.org>; Monty Todd <mtodd@sowellgray.com>; Michael Montgomery <mmontgomery@sowellgray.com>; Catone, Tony <Tony.Catone@dss.sc.gov>; Davis, Taron <Taron.Davis@dss.sc.gov>; Butch Bowers <Butch@ButchBowers.com>; Pisarik, Holly <HollyPisarik@gov.sc.gov>; Shackelford, John <John.Shackelford@dss.sc.gov>
Subject: Re: Defendants Counter Proposals November 13

I'm also very confused. I think we need to strike through plaintiffs proposals that we're rejecting. I'll send some edits by 4:15. Please hold off on sending.

Andy

Justice Corrigan wrote:

I do not understand why D.3 a is still in here on Investigations requiring that face to face contact be initiated within 2 to 24 hours? I thought we agreed to strike any reference to anything smelling of initiation and just stick with completion?

Sent from my iPad

On Nov 13, 2015, at 3:44 PM, Carenn Moore <cmoore@sowellgray.com> wrote:

This is the final DRAFT that we intend to submit to Children's Rights and Judge Duffy this afternoon. Please call us with any revisions by 4:15 to meet this deadline.

Many thanks to all of you for your assistance.

Becky

From: Carenn Moore

Sent: Friday, November 13, 2015 10:22 AM

To: Becky Laffitte <blaffitte@sowellgray.com>; Andy Barclay <andy@fosteringcourtimprovement.org>; Justice Corrigan <justicecorrigan@hotmail.com>; Page Walley <PWalley@casey.org>

Cc: Monty Todd <mtodd@sowellgray.com>; Michael Montgomery <mmontgomery@sowellgray.com>; Catone, Tony <Tony.Catone@dss.sc.gov>; Davis, Taron <Taron.Davis@dss.sc.gov>; Butch Bowers <Butch@ButchBowers.com>; Pisarik, Holly <HollyPisarik@gov.sc.gov>; Shackelford, John <John.Shackelford@dss.sc.gov>

Subject: RE: Defendants Counter Proposals November 13

Here is the current DRAFT.

Carenn

From: Becky Laffitte

Sent: Friday, November 13, 2015 10:21 AM

To: Andy Barclay <andy@fosteringcourtimprovement.org>; Justice Corrigan <justicecorrigan@hotmail.com>; Page Walley <PWalley@casey.org>

Cc: Becky Laffitte <blaffitte@sowellgray.com>; Carenn Moore <cmoore@sowellgray.com>; Monty Todd <mtodd@sowellgray.com>; Michael Montgomery <mmontgomery@sowellgray.com>; Catone, Tony <Tony.Catone@dss.sc.gov>; Davis, Taron <Taron.Davis@dss.sc.gov>; Butch Bowers <Butch@ButchBowers.com>; Pisarik, Holly <HollyPisarik@gov.sc.gov>; Shackelford, John <John.Shackelford@dss.sc.gov>

Subject: Defendants Counter Proposals November 13

Importance: High

Good morning

Given that we didn't receive the word document until 12:01 am, Carenn is finishing the current revisions. We will need to act quickly to offer comments and suggested revisions. John, Andy has indicated we will need your

assistance with Therapeutic Foster Care Placements. We would like to
conference at 1:30 if possible. Carenn will circulate the call in information.
Thanks B



Rebecca Laffitte v-card

Member

(803) 231-7831

www.sowellgray.com

<image002.jpg>

Supporting Gre

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<6734-1500 DEFENDANTS' DRAFT OF SETTLEMENT
AGREEMENT - 11-13-15 (A0829372xA08D7).docx>

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