

**From:** Ira Lustbader <ilustbader@childrensrights.org>  
**To:** Matthew T. RichardsonMRichardson@wyche.com  
Catone, TonyTony.Catone@dss.sc.gov  
Monty Toddmtodd@sowellgray.com  
Becky Laffitteblaffitte@sowellgray.com  
Whittle, AmandaAmanda.Whittle@dss.sc.gov  
Pisarik, HollyHollyPisarik@gov.sc.gov  
Butch BowersButch@ButchBowers.com  
**CC:** Cricket Rawlsrawls@wyche.com  
sberk@scjustice.orgsberk@scjustice.org  
Sarah Cox Wagnerswagner@wyche.com  
**Date:** 6/17/2016 5:01:03 PM  
**Subject:** RE: Allocation of Fee Payments

---

Yes we agree with this instructions.

---

**From:** Matthew T. Richardson [mailto:MRichardson@wyche.com]  
**Sent:** Friday, June 17, 2016 4:37 PM  
**To:** Catone, Tony <Tony.Catone@dss.sc.gov>; Monty Todd <mtodd@sowellgray.com>; Becky Laffitte <blaffitte@sowellgray.com>; Whittle, Amanda <Amanda.Whittle@dss.sc.gov>; Pisarik, Holly <HollyPisarik@gov.sc.gov>; Butch Bowers <Butch@ButchBowers.com>  
**Cc:** Cricket Rawls <crawls@wyche.com>; Ira Lustbader <ilustbader@childrensrights.org>; sberk@scjustice.org; Matthew T. Richardson <MRichardson@wyche.com>; Sarah Cox Wagner <swagner@wyche.com>  
**Subject:** RE: Allocation of Fee Payments

Thank you very much. Please send it to me payable to Matthew Richardson and Wyche, PA; and we will disburse to the others.

Ira and Sue can confirm these instructions by response to this email.

Also, attached is the W-9 for Wyche, P.A. Please let me know if you need anything further.

Thank you,  
Matthew



Matthew T. Richardson | Wyche  
801 Gervais St, Suite B | Columbia, SC 29201  
Phone: (803) 254-6542 | Fax: (803) 254-6544  
mrichardson@wyche.com | www.wyche.com/mrichardson | vCard

---

**From:** Catone, Tony [mailto:Tony.Catone@dss.sc.gov]  
**Sent:** Friday, June 17, 2016 4:10 PM  
**To:** Matthew T. Richardson; Monty Todd; Becky Laffitte; Whittle, Amanda; Pisarik, Holly; Butch Bowers  
**Subject:** Allocation of Fee Payments

Dear Matthew,

Under the agreed-upon fee payment schedule the first payment is due July 15, 2016, in the amount of \$510,631.14. Please let me know to whom you would like us to make the payment. One way we could do it is to make it out to you / Wyche on behalf of all the plaintiffs' counsel (would need documentation of their

agreement) and then you could disburse to the others. If that will not suit, and if necessary, we can explore making separate checks according to an allocation y'all agree on—just let us know as soon as you can.

I wanted to go ahead and raise this matter now in order to avoid it causing any delay in July.

With warm regards,

Tony

Anthony S. H. Catone  
General Counsel  
South Carolina Department of Social Services  
Office of General Counsel  
P.O. Box 1520  
Columbia, SC 29202-1520

Office Phone: (803) 898-7368  
Fax: 803-898-7245  
Email: [tony.catone@dss.sc.gov](mailto:tony.catone@dss.sc.gov)

Privacy Notice: This message may contain information that is protected from disclosure by federal and/or state law, or is otherwise privileged or confidential. This communication is intended only for the use of the individual or entity to whom it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering this message to the recipient, you are hereby notified that any dissemination, distribution, or copying of this message is strictly prohibited and violations of applicable federal and/or state law may subject you to civil and/or criminal penalties. If you have received this message in error, please notify the sender immediately by telephone and delete this message.

-----  
This e-mail may contain privileged or confidential information.  
If the e-mail was not intended for you, please:  
(i) delete the e-mails and any attachments  
(ii) destroy any copies that may have been made  
(iii) do not use, copy or distribute the contents in any form  
(iv) notify the sender by return e-mail or by calling 864-242-8200.  
No privilege is waived by inadvertent transmission.  
Thank you.  
-----