

**From:** Carenn Moore <[cmoore@sowellgray.com](mailto:cmoore@sowellgray.com)>  
**To:** [Becky Laffitteblaffitte@sowellgray.com](mailto:Becky.Laffitteblaffitte@sowellgray.com)  
[holly@pisariklawfirm.com](mailto:holly@pisariklawfirm.com)[holly@pisariklawfirm.com](mailto:holly@pisariklawfirm.com)  
[Whittle, AmandaAmanda.Whittle@dss.sc.gov](mailto:Whittle,Amanda.Amanda.Whittle@dss.sc.gov)  
**CC:** [Catone, TonyTony.Catone@dss.sc.gov](mailto:Catone,Tony.Tony.Catone@dss.sc.gov)  
[Butch BowersButch@butchbowers.com](mailto:Butch.BowersButch@butchbowers.com)  
[Monty Toddmtodd@sowellgray.com](mailto:Monty.Toddmtodd@sowellgray.com)  
[Robin Owensrowens@sowellgray.com](mailto:Robin.Owensrowens@sowellgray.com)  
[Taylor, RicheleRicheleTaylor@gov.sc.gov](mailto:Taylor,RicheleRicheleTaylor@gov.sc.gov)  
**Date:** 9/13/2016 8:03:24 AM  
**Subject:** RE: DSS September 7 CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION

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We have a conference room available here and have it reserved. We look forward to seeing you this morning at 11:00 a.m. THANKS!

Carenn

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**From:** Becky Laffitte  
**Sent:** Tuesday, September 13, 2016 5:47 AM  
**To:** [holly@pisariklawfirm.com](mailto:holly@pisariklawfirm.com); [Whittle, Amanda <Amanda.Whittle@dss.sc.gov>](mailto:Whittle,Amanda.Amanda.Whittle@dss.sc.gov)  
**Cc:** [Catone, Tony <Tony.Catone@dss.sc.gov>](mailto:Catone,Tony.Tony.Catone@dss.sc.gov); [Carenn Moore <cmoore@sowellgray.com>](mailto:cmoore@sowellgray.com); [Butch Bowers <Butch@butchbowers.com>](mailto:Butch.BowersButch@butchbowers.com); [Monty Todd <mtodd@sowellgray.com>](mailto:mtodd@sowellgray.com); [Robin Owens <rowens@sowellgray.com>](mailto:rowens@sowellgray.com); [richeletaylor@gov.sc.gov](mailto:richeletaylor@gov.sc.gov)  
**Subject:** RE: DSS September 7 CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION

Holly

Sorry for any inconvenience. Matthew and company feel we need to send to Judge Gergel 2 weeks in advance of the hearing.. Thanks for making this work. B

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**From:** [holly@pisariklawfirm.com](mailto:holly@pisariklawfirm.com) [<mailto:holly@pisariklawfirm.com>]  
**Sent:** Monday, September 12, 2016 6:49 PM  
**To:** [Becky Laffitte <blaffitte@sowellgray.com>](mailto:blaffitte@sowellgray.com); [Whittle, Amanda <Amanda.Whittle@dss.sc.gov>](mailto:Whittle,Amanda.Amanda.Whittle@dss.sc.gov)  
**Cc:** [Catone, Tony <Tony.Catone@dss.sc.gov>](mailto:Catone,Tony.Tony.Catone@dss.sc.gov); [Carenn Moore <cmoore@sowellgray.com>](mailto:cmoore@sowellgray.com); [Butch Bowers <Butch@butchbowers.com>](mailto:Butch.BowersButch@butchbowers.com); [Monty Todd <mtodd@sowellgray.com>](mailto:mtodd@sowellgray.com); [Robin Owens <rowens@sowellgray.com>](mailto:rowens@sowellgray.com); [richeletaylor@gov.sc.gov](mailto:richeletaylor@gov.sc.gov)  
**Subject:** RE: DSS September 7 CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION

I will make tomorrow work. I can be available from 11:00 – 1:00.

Sent from [Mail](#) for Windows 10

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**From:** [Becky Laffitte](#)  
**Sent:** Monday, September 12, 2016 6:32 PM  
**To:** [holly@pisariklawfirm.com](mailto:holly@pisariklawfirm.com); [Whittle, Amanda](#)  
**Cc:** [Catone, Tony](#); [Carenn Moore](#); [Butch Bowers](#); [Monty Todd](#); [Robin Owens](#); [richeletaylor@gov.sc.gov](mailto:richeletaylor@gov.sc.gov)  
**Subject:** RE: DSS September 7 CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION

Holly

Matthew and company want our thoughts by Monday at the latest...that is why we were trying to find some time this week. I have a mediation on Wednesday, am in Ridgeland on Thursday and Florence on Friday morning. However, I'll work with you in any way. B

Ito:holly@pisariklawfirm.com]

Sent: Monday, September 12, 2016 6:14 PM

To: Whittle, Amanda <[Amanda.Whittle@dss.sc.gov](mailto:Amanda.Whittle@dss.sc.gov)>; Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>

Cc: Catone, Tony <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)>; Carenn Moore <[cmoore@sowellgray.com](mailto:cmoore@sowellgray.com)>; Butch Bowers <[Butch@butchbowers.com](mailto:Butch@butchbowers.com)>; Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; Robin Owens <[rowens@sowellgray.com](mailto:rowens@sowellgray.com)>; [richeletaylor@gov.sc.gov](mailto:richeletaylor@gov.sc.gov)

Subject: RE: DSS September 7 CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION

Can we look at availability next week?

Sent from [Mail](#) for Windows 10

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From: [Whittle, Amanda](#)

Sent: Monday, September 12, 2016 5:46 PM

To: [Becky Laffitte](#)

Cc: [Catone, Tony](#); [Carenn Moore](#); [Holly Pisarik](#); [Butch Bowers](#); [Monty Todd](#); [Robin Owens](#); [richeletaylor@gov.sc.gov](mailto:richeletaylor@gov.sc.gov)

Subject: Re: DSS September 7 CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION

I am available then also.

*Amanda F. Whittle  
Assistant General Counsel  
Office of General Counsel  
S.C. Dept. of Social Services  
Post Office Box 1520  
Columbia, SC 29202-1520  
803-898-0776 telephone  
803-898-7245 facsimile  
803-917-1323 cellular*

Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)> wrote:

I'll wait to hear from everyone on their availability. Thanks and have a nice evening. B

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From: Catone, Tony [<mailto:Tony.Catone@dss.sc.gov>]

Sent: Monday, September 12, 2016 5:11 PM

To: Carenn Moore <[cmoore@sowellgray.com](mailto:cmoore@sowellgray.com)>; Holly Pisarik <[holly@pisariklawfirm.com](mailto:holly@pisariklawfirm.com)>

Cc: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>; Whittle, Amanda <[Amanda.Whittle@dss.sc.gov](mailto:Amanda.Whittle@dss.sc.gov)>; Butch Bowers <[Butch@butchbowers.com](mailto:Butch@butchbowers.com)>; Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; Robin Owens <[rowens@sowellgray.com](mailto:rowens@sowellgray.com)>; [richeletaylor@gov.sc.gov](mailto:richeletaylor@gov.sc.gov)

Subject: RE: DSS September 7 CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION

Before 1:00 works for me...

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  
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From: Carenn Moore [<mailto:cmoore@sowellgray.com>]  
Sent: Monday, September 12, 2016 2:46 PM  
To: Holly Pisarik <[holly@pisariklawfirm.com](mailto:holly@pisariklawfirm.com)>; Catone, Tony <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)>  
Cc: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>; Whittle, Amanda <[Amanda.Whittle@dss.sc.gov](mailto:Amanda.Whittle@dss.sc.gov)>; Butch Bowers <[Butch@butchbowers.com](mailto:Butch@butchbowers.com)>; Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; Robin Owens <[rowens@sowellgray.com](mailto:rowens@sowellgray.com)>; [richeletaylor@gov.sc.gov](mailto:richeletaylor@gov.sc.gov)  
Subject: RE: DSS September 7 CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION  
Importance: High

I am so sorry to bother all of you about scheduling this meeting, BUT Becky's day tomorrow just cleared up so if tomorrow works for everyone, can we please set the meeting for some time then?

Please let me hear from you as soon as possible as I recall this one of the days that seemed to work for everyone (Tuesday morning).

Thanks!

Carenn

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From: Carenn Moore  
Sent: Thursday, September 8, 2016 2:24 PM  
To: 'Holly Pisarik' <[holly@pisariklawfirm.com](mailto:holly@pisariklawfirm.com)>; 'Catone, Tony' <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)>  
Cc: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>; 'Whittle, Amanda' <[Amanda.Whittle@dss.sc.gov](mailto:Amanda.Whittle@dss.sc.gov)>; 'Butch Bowers' <[Butch@butchbowers.com](mailto:Butch@butchbowers.com)>; Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; Robin Owens <[rowens@sowellgray.com](mailto:rowens@sowellgray.com)>; 'richeletaylor@gov.sc.gov' <[richeletaylor@gov.sc.gov](mailto:richeletaylor@gov.sc.gov)>  
Subject: RE: DSS September 7 CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION

So, apparently, we are the ones to put a "kink" in the plans! Becky and Monty are both out of town next Tuesday. Monty is available on Wednesday, September 21 (at any time) and also in the morning on Thursday, September 22. Would one of these work for everyone?

Carenn

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From: Carenn Moore  
Sent: Thursday, September 8, 2016 1:08 PM  
To: 'Holly Pisarik' <[holly@pisariklawfirm.com](mailto:holly@pisariklawfirm.com)>; Catone, Tony <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)>  
Cc: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>; Whittle, Amanda <[Amanda.Whittle@dss.sc.gov](mailto:Amanda.Whittle@dss.sc.gov)>; Butch Bowers

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<[Butch@butchbowers.com](mailto:Butch@butchbowers.com)>; Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; Robin Owens <[rowens@sowellgray.com](mailto:rowens@sowellgray.com)>;  
'richeletaylor@gov.sc.gov' <[richeletaylor@gov.sc.gov](mailto:richeletaylor@gov.sc.gov)>

Subject: RE: DSS September 7 CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION

Hi – unfortunately, Becky has a mediation in Spartanburg Tuesday (begins at 10:00). As soon as Robin returns from lunch, I'll check to see if Monty is available.

Carenn

Carenn N. Moore  
Legal Assistant to Becky Laffitte and Michael Montgomery  
Sowell Gray Stepp & Laffitte, LLC  
Post Office Box 11449  
Columbia, SC 29211  
Telephone: 803.231.7803  
Telecopy: 803.231.7854

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From: Holly Pisarik [<mailto:holly@pisariklawfirm.com>]  
Sent: Thursday, September 8, 2016 1:02 PM  
To: Catone, Tony <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)>  
Cc: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>; Whittle, Amanda <[Amanda.Whittle@dss.sc.gov](mailto:Amanda.Whittle@dss.sc.gov)>; Butch Bowers <[Butch@butchbowers.com](mailto:Butch@butchbowers.com)>; Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; Carenn Moore <[cmoore@sowellgray.com](mailto:cmoore@sowellgray.com)>; Robin Owens <[rowens@sowellgray.com](mailto:rowens@sowellgray.com)>  
Subject: Re: DSS September 7 CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION

Sorry, e-mail address is [Richeletaylor@gov.sc.gov](mailto:Richeletaylor@gov.sc.gov).

On Thu, Sep 8, 2016 at 12:53 PM, Holly Pisarik <[holly@pisariklawfirm.com](mailto:holly@pisariklawfirm.com)> wrote:

Of the times proposed by Tony, Thursday works best for me. I will be at an all day DSS meeting on Wednesday and out of town on Friday. I will already be in Columbia on Tuesday afternoon for another meeting, if Tuesday morning would work.

Yes, please include Richele Taylor as the Governor's new Chief Legal Counsel. Her e-mail address is [Richele@gov.sc.gov](mailto:Richele@gov.sc.gov).

Thanks, Holly

On Wed, Sep 7, 2016 at 4:04 PM, Catone, Tony <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)> wrote:

Thanks Becky—I agree a conference would be beneficial. Wed., Thurs., or Fri. of next week work best for me right now (Thursday a.m.).

One other note, and I believe Holly would best speak to it, is whether we should begin to include Richele Taylor, the new Chief Counsel for the Governor's Office, in our meeting/conference.

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

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From: Becky Laffitte [mailto:[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)]  
Sent: Wednesday, September 7, 2016 2:41 PM  
To: Catone, Tony <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)>; Whittle, Amanda <[Amanda.Whittle@dss.sc.gov](mailto:Amanda.Whittle@dss.sc.gov)>; Butch Bowers <[Butch@ButchBowers.com](mailto:Butch@ButchBowers.com)>; [holly@pisariklawfirm.com](mailto:holly@pisariklawfirm.com)  
Cc: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>; Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; Carenn Moore <[cmoore@sowellgray.com](mailto:cmoore@sowellgray.com)>; Robin Owens <[rowens@sowellgray.com](mailto:rowens@sowellgray.com)>  
Subject: FW: DSS September 7 CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION  
Importance: High

Good afternoon, Tony, Amanda Butch and Holly:

We hope this email finds you well. With the recent influx of letters about the proposed Settlement, we thought it may be good to get together several weeks before October 4 to strategize....Please let us know what may work with your calendars.

Also, thought you'd find of interest that Kathryn Wood has been reviewing documents we produced in Sharefile. (see above) We suspect it has to do with the recent letters received in support and or opposition to the proposed Settlement

As October 4 is just around the corner, we look forward to conferencing in the near future about the hearing.  
Best, Becky

these two emails from ShareFile indicate that Kathryn Wood from Children's Rights has accessed the documents (either viewed or downloaded) referenced in these two e-mails.