

From: Andy Barclay <[andy@fosteringcourtimprovement.org](mailto:andy@fosteringcourtimprovement.org)>

To: Becky Laffitteblaffitte@sowellgray.com

Carenn Moorecmoore@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 4:23:01 PM

Subject: Re: Defendants Counter Proposals November 13

Attachments: 6734-1500 DEFENDANTS' DRAFT OF SETTLEMENT AGREEMENT - 11-13-15 (A0829372xA08D7)\_ab20151113b.docx

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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

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From: Andy Barclay [<mailto:andy@fosteringcourtimprovement.org>]

Sent: Friday, November 13, 2015 4:05 PM

To: Justice Corrigan <[justicecorrigan@hotmail.com](mailto:justicecorrigan@hotmail.com)>; Carenn Moore <[cmoore@sowellgray.com](mailto:cmoore@sowellgray.com)>

Cc: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>; Page Walley <[PWalley@casey.org](mailto:PWalley@casey.org)>; Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; Michael Montgomery <[mmontgomery@sowellgray.com](mailto:mmontgomery@sowellgray.com)>; Catone, Tony <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)>; Davis, Taron <[Taron.Davis@dss.sc.gov](mailto:Taron.Davis@dss.sc.gov)>; Butch Bowers <[Butch@ButchBowers.com](mailto:Butch@ButchBowers.com)>;

Pisarik, Holly <[HollyPisarik@gov.sc.gov](mailto:HollyPisarik@gov.sc.gov)>; Shackelford, John <[John.Shackelford@dss.sc.gov](mailto: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](mailto: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

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From: Carenn Moore  
Sent: Friday, November 13, 2015 10:22 AM  
To: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>; Andy Barclay <[andy@fosteringcourtimprovement.org](mailto:andy@fosteringcourtimprovement.org)>; Justice Corrigan <[justicecorrigan@hotmail.com](mailto:justicecorrigan@hotmail.com)>; Page Walley <[PWalley@casey.org](mailto:PWalley@casey.org)>  
Cc: Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; Michael Montgomery <[mmontgomery@sowellgray.com](mailto:mmontgomery@sowellgray.com)>; Catone, Tony <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)>; Davis, Taron <[Taron.Davis@dss.sc.gov](mailto:Taron.Davis@dss.sc.gov)>; Butch Bowers <[Butch@ButchBowers.com](mailto:Butch@ButchBowers.com)>; Pisarik, Holly <[HollyPisarik@gov.sc.gov](mailto:HollyPisarik@gov.sc.gov)>; Shackelford, John <[John.Shackelford@dss.sc.gov](mailto:John.Shackelford@dss.sc.gov)>  
Subject: RE: Defendants Counter Proposals November 13

Here is the current DRAFT.

Carenn

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From: Becky Laffitte  
Sent: Friday, November 13, 2015 10:21 AM  
To: Andy Barclay <[andy@fosteringcourtimprovement.org](mailto:andy@fosteringcourtimprovement.org)>; Justice Corrigan <[justicecorrigan@hotmail.com](mailto:justicecorrigan@hotmail.com)>; Page Walley <[PWalley@casey.org](mailto:PWalley@casey.org)>  
Cc: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>; Carenn Moore <[cmoore@sowellgray.com](mailto:cmoore@sowellgray.com)>; Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; Michael Montgomery <[mmontgomery@sowellgray.com](mailto:mmontgomery@sowellgray.com)>; Catone, Tony <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)>; Davis, Taron <[Taron.Davis@dss.sc.gov](mailto:Taron.Davis@dss.sc.gov)>; Butch Bowers <[Butch@ButchBowers.com](mailto:Butch@ButchBowers.com)>; Pisarik, Holly <[HollyPisarik@gov.sc.gov](mailto:HollyPisarik@gov.sc.gov)>; Shackelford, John <[John.Shackelford@dss.sc.gov](mailto: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](http://www.sowellgray.com)

<[image002.jpg](#)>

Supporting Green. P

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11-13-15 (A0829372xA08D7).docx>

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