

From: Becky Laffitte <blaffitte@sowellgray.com>
To: Catone, TonyTony.Catone@dss.sc.gov
Whittle, AmandaAmanda.Whittle@dss.sc.gov
Butch BowersButch@ButchBowers.com
Taylor, RicheleRicheleTaylor@gov.sc.gov
holly@pisariklawfirm.comholly@pisariklawfirm.com
CC: Becky Laffitteblaffitte@sowellgray.com
Monty Toddmtdodd@sowellgray.com
Carenn Moorecmoore@sowellgray.com
Robin Owensrowens@sowellgray.com
Date: 9/19/2016 5:01:05 PM
Subject: FW: Michelle H., et al. v. Haley, et al. 2:15-cv-00134-RMG

FYI

From: Matthew T. Richardson [mailto:MRichardson@wyche.com]
Sent: Monday, September 19, 2016 4:58 PM
To: 'gergel_ecf@scd.uscourts.gov' <gergel_ecf@scd.uscourts.gov>
Cc: Aaron Finch <afinch@childrensrights.org>; Christina Remlin <cremlin@childrensrights.org>; Ira Lustbader <ilustbader@childrensrights.org>; Michael Montgomery <mmontgomery@sowellgray.com>; 'butch@butchbowers.com' <butch@butchbowers.com>; 'Kate Wood' <kwood@childrensrights.org>; Monty Todd <mtodd@sowellgray.com>; Becky Laffitte <blaffitte@sowellgray.com>; 'Stephen Suggs' <SSuggs@scjustice.org>; Sue Berkowitz (sberk@scjustice.org) <sberk@scjustice.org>; Matthew T. Richardson <MRichardson@wyche.com>; Sarah Cox <scox@wyche.com>
Subject: Michelle H., et al. v. Haley, et al. 2:15-cv-00134-RMG

Dear Judge Gergel,

Pursuant to paragraph 3(f) of the Court's Order Granting Preliminary Approval of Class Action Settlement Agreement, Setting Hearing for the Final Approval, and Directing Notice to the Class (Dckt. 35, at 6), the parties herein "submit to the Court all written submissions received from Class Members, or interested parties, and any written responses to such submissions, on or before September 19, 2016."

The DropBox link (password protected, password to come in separate email) below contains all but one of the written submissions and responses. In addition to the two folders below, there are two files in the main directory—one of which is the list of people submitting written comments who received the other file that is the form response letter. The two folders are descriptive:

- (1) Cited, Discussed, and Attached to Joint Motion for Final Approval (the Joint Motion with these attached will be filed this week).
- (2) Personal and Confidential Information Included (provided herein but not to be filed publicly, unless ordered by the Court).

<https://www.dropbox.com/sh/k82d2vp6n6nplr1/AAAWzxXbe3SiV9MXwAJ0GDfa?dl=0>

There will be another email submitting for *in camera* review the one written submission with apparent attorney-client privileged communications and which is being provided to the Court but not to Defendants (and is not to be filed publicly or provided to Defendants, unless ordered by the Court).

In the nature of a privilege log, we note this privileged communication is a handwritten letter from an incarcerated

parent inquiring about how to present allegations of repeated sexual assault of the parent's minor daughter while in DSS custody and whether the class action settlement would have any adverse consequences on bringing future claims against DSS for that abuse. We believe the author was writing to seek attorney-client privileged and confidential communications regarding the parent's and/or the minor's potential claims, which we declined to provide and advised that the parent would need to contact other attorneys for legal advice about her potential claims. Please let us know if you have any questions.

Most respectfully,
Matthew Richardson



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

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.
