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Date: 2/19/2016 3:06:06 PM
Subject: RE: Emailing: 2016 02 18 DRAFT SETTLEMENT AGREEMENT (Clarifications).docx, Appendix Pre-Approved Agreed Upon exceptions 2-18-16.docx CONFIDENTIAL... MEDIATION NEGOTIATIONS DOCUMENT....ATTORNEY-CLIENT PRIVILEGE

Thanks so much, Andy. Take care B

From: Andy Barclay [mailto:andy@fosteringcourtimprovement.org]
Sent: Friday, February 19, 2016 3:05 PM
To: Becky Laffitte <blaffitte@sowellgray.com>
Cc: Justice Corrigan <justicecorrigan@hotmail.com>; Monty Todd <mtodd@sowellgray.com>; Carenn Moore <cmoore@sowellgray.com>; Michael Montgomery <mmontgomery@sowellgray.com>; Catone, Tony <Tony.Catone@dss.sc.gov>; Whittle, Amanda <Amanda.Whittle@dss.sc.gov>; Davis, Taron <Taron.Davis@dss.sc.gov>; Pisarik, Holly <HollyPisarik@gov.sc.gov>; Butch Bowers <Butch@ButchBowers.com>
Subject: Re: Emailing: 2016 02 18 DRAFT SETTLEMENT AGREEMENT (Clarifications).docx, Appendix Pre-Approved Agreed Upon exceptions 2-18-16.docx CONFIDENTIAL...MEDIATION NEGOTIATIONS DOCUMENT....ATTORNEY-CLIENT PRIVILEGE

Hi Becky,

I think the Appendix is a great addition. A few comments on agreement:

1. period start date language is good
2. p 5, III.A.: delete "(120)" in "... the Monitors shall have sixty (60) (120) days to produce ..."
3. p 5, III.A.: delete "(21)" in "the parties shall have fourteen (14) (21) days to submit ..."
4. I like the changes to III.B, clarifying delegation.
5. Very good safeguard: "M. The Monitors may meet privately with the Court concerning issues related to this case, provided both Monitors are present and the parties are made aware of the occurrence and subject of such meetings."
6. Much better on IV.A.1: "the foster care Workload Study"
7. Much better on IV.C (if Ps agree): "Referral of Institutional Abuse or Neglect"
8. That's a much more generous IV.C.f target: "(f) Timely Completion of All Investigations Within 90 days. At least 95% of all investigations of a Referral of Institutional Abuse or Neglect shall be completed within 90 days."
9. I like the changes to IV.E. Congregate Care Placements
10. Good catch switching V.B. from achievement to substantial compliance

Have a great weekend,

Andy

Becky Laffitte wrote:

Good morning Justice Corrigan

Many thanks. Hope you and yours are well. B

-----Original Message-----

From: Justice Corrigan [<mailto:justicecorrigan@hotmail.com>]

Sent: Friday, February 19, 2016 9:37 AM

To: Becky Laffitte <blaffitte@sowellgray.com>

Cc: Andy Barclay <andy@fosteringcourtimprovement.org>; Monty Todd <mtodd@sowellgray.com>
Butch Bowers <Butch@ButchBowers.com>

Subject: Re: Emailing: 2016 02 18 DRAFT SETTLEMENT AGREEMENT (Clarifications).docx, App

Good morning Becky and members of the defense team,

I have reviewed the proposed Appendix in light of the Settlement Agreement and have no

All the best, Maura

Sent from my iPad

On Feb 18, 2016, at 5:49 PM, Becky Laffitte <blaffitte@sowellgray.com> wrote:

Good afternoon, Andy and Justice Corrigan:

Attached please find the latest version of a counter-proposal that we intend to su

Since we could not make any SUBSTANTIVE changes, we attempted to clarify areas of

Hope you and yours are well. We miss seeing you. Best, Becky

Becky Laffitte
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<Appendix Pre-Approved Agreed Upon exceptions 2-18-16.docx>

<2016 02 18 DRAFT SETTLEMENT AGREEMENT (Clarifications).docx>

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