

From: Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>  
To: Catone, Tony [Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)  
Becky Laffitte [blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)  
Pisarik, Holly [HollyPisarik@gov.sc.gov](mailto:HollyPisarik@gov.sc.gov)  
Whittle, Amanda [Amanda.Whittle@dss.sc.gov](mailto:Amanda.Whittle@dss.sc.gov)  
Butch Bowers [Butch@ButchBowers.com](mailto:Butch@ButchBowers.com)  
CC: Davis, Taron [Taron.Davis@dss.sc.gov](mailto:Taron.Davis@dss.sc.gov)  
Date: 3/19/2016 8:13:48 AM  
Subject: RE: Phase in Proposal and Email

---

I may be missing the obvious, but if we are still going to be monitored and measured and if the measurements and data from the monitoring will be public information, do we gain any benefit from the phasing in of the goals other than avoiding a potential morale problem for not hitting measurements in the first year or two of the expected agreement? Probably a better way to frame the question is "what benefits do we get from phasing in of the targets?"

---

From: Catone, Tony [<mailto:Tony.Catone@dss.sc.gov>]  
Sent: Friday, March 18, 2016 5:27 PM  
To: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>; Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; [hollypisarik@gov.sc.gov](mailto:hollypisarik@gov.sc.gov);  
Whittle, Amanda <[Amanda.Whittle@dss.sc.gov](mailto:Amanda.Whittle@dss.sc.gov)>; Butch Bowers <[Butch@ButchBowers.com](mailto:Butch@ButchBowers.com)>  
Subject: Phase in Proposal and Email

Dear Becky and Monty,

On Tuesday we said we believed we could have something to the Plaintiffs by today that would show them our phase-in concept in writing. We have struggled with how to present this to the Plaintiffs so would appreciate any team feedback. Attached is a draft email to the plaintiffs along with draft phase-in plan. The email was written by Amanda based on her efforts and communications with the Monitors and I have offered revisions and a couple of comments. We would like to get this to the Plaintiffs, at least as a starting point. If you cannot review or get to it today because we're just now getting it to you, perhaps Monty could call Matthew and let him know we sent it and y'all are going to look over and send Monday. I also wondered to myself today whether Justice Corrigan could be helpful in this phasing strategy, as it seems we've concentrated so specifically on the co-monitors that I, for one, have not thought of her as a resource on this issue.

Thank you for your service as always,

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](tel: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.