

**From:** Catone, Tony <Tony.Catone@dss.sc.gov>  
**To:** Kenneth P. Woodingtonkwoodington@DML-LAW.com  
Pisarik, HollyHollyPisarik@gov.sc.gov  
**Date:** 3/14/2016 3:35:39 PM  
**Subject:** RE: Rule 26.01 responses

---

Fine with 26.01 responses, currently reviewing answer...

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  
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.

---

**From:** Kenneth P. Woodington [mailto:kwoodington@DML-LAW.com]  
**Sent:** Monday, March 14, 2016 3:28 PM  
**To:** HollyPisarik@gov.sc.gov; Catone, Tony <Tony.Catone@dss.sc.gov>  
**Subject:** Rule 26.01 responses

Holly and Tony, please review these. I see no need to request a jury trial, and do not think it would even be appropriate, since only equitable relief is sought.

Also, I am not aware of any misidentified party, but if you see a need for a change, please advise.

Thanks,

Ken