

**From:** Becky Laffitte <blaffitte@sowellgray.com>  
**To:** Justice Corriganjusticecorrigan@hotmail.com  
Carenn Moorecarennmoore@sowellgray.com  
**CC:** Andy Barclayandy@fosteringcourtimprovement.org  
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 4:05:34 PM  
**Subject:** RE: Defendants Counter Proposals November 13

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Justice Corrigan:

We deleted. Carenn left in plaintiff's d3...Defendant's counter is under that one...somewhat confusing but trying to give everyone a point of reference to all responses

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**From:** Justice Corrigan [mailto:justicecorrigan@hotmail.com]  
**Sent:** Friday, November 13, 2015 4:03 PM  
**To:** Carenn Moore <cmoore@sowellgray.com>  
**Cc:** Becky Laffitte <blaffitte@sowellgray.com>; Andy Barclay <andy@fosteringcourtimprovement.org>; Page Walley <PWalley@casey.org>; Monty Todd <mtodd@sowellgray.com>; Michael Montgomery <mmontgomery@sowellgray.com>; Catone, Tony <Tony.Catone@dss.sc.gov>; Davis, Taron <Taron.Davis@dss.sc.gov>; Butch Bowers <Butch@ButchBowers.com>; Pisarik, Holly <HollyPisarik@gov.sc.gov>; Shackelford, John <John.Shackelford@dss.sc.gov>  
**Subject:** Re: Defendants Counter Proposals November 13

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> 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>; Andy Barclay <andy@fosteringcourtimprovement.org>; Justice Corrigan <justicecorrigan@hotmail.com>; Page Walley <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**

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<image002.jpg>

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