

**From:** Taylor, Richele  
**To:** Godfrey, Rob <RobGodfrey@gov.sc.gov>  
Symmes, Brian <BrianSymmes@gov.sc.gov>  
**CC:** Butch Bowers <Butch@ButchBowers.com>  
**Date:** 10/3/2016 2:59:55 PM  
**Subject:** RE: Exchange Press Releases?

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I do not think we should provide a statement. We have stayed removed although a named party. The majority of negotiations have occurred between DSS and the plaintiffs' counsel.

I did want you to see the press release beforehand since we are a named party. I have just requested an updated one if it is available. I thought you would want to review and advise the Governor that it would likely come out tomorrow. I advised her Friday that the DSS settlement hearing is tomorrow and that it would likely make press.

Richele

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**From:** Godfrey, Rob  
**Sent:** Monday, October 03, 2016 12:48 PM  
**To:** Taylor, Richele; Symmes, Brian  
**Cc:** Butch Bowers  
**Subject:** RE: Exchange Press Releases?

Do y'all recommend adding a quote from us? Has that been discussed?

**Rob Godfrey**  
**Office of Governor Nikki Haley**  
**Desk: (803) 734-2028 | Mobile: (803) 429-6068**

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**From:** Taylor, Richele  
**Sent:** Monday, October 03, 2016 12:24 PM  
**To:** Godfrey, Rob; Symmes, Brian  
**Cc:** Butch Bowers  
**Subject:** FW: Exchange Press Releases?

Rob and Brian –

There will be a joint press release from all the parties for the DSS hearing tomorrow regarding the class action settlement. Although we have had a trivial role, we are a party. I have attached the latest version. DSS is looking at it now and I will flip the next one, but I wanted to give you a heads up. I would like you to read before we agree to the final.

Richele

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**From:** Matthew T. Richardson [<mailto:MRichardson@wyche.com>]  
**Sent:** Monday, October 03, 2016 11:47 AM  
**To:** Catone, Tony  
**Cc:** Becky Laffitte; Monty Todd; Pisarik, Holly; Whittle, Amanda; Butch Bowers; Taylor, Richele; Ira Lustbader; Christina Remlin; 'Kate Wood'; Sue Berkowitz; 'Stephen Suggs'; Matthew T. Richardson  
**Subject:** RE: Exchange Press Releases?

Good morning,

I have attached our draft press release for tomorrow. It is written two ways—one if he rules from the bench, and one

if he takes it under advisement. We will only send one version tomorrow.

Please send us some description of what the Director intends to say tomorrow in addressing the Court in the open hearing.

Thanks and look forward to seeing you in Chambers at 9:45 am tomorrow,  
Matthew

Matthew T. Richardson | Wyche  
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Phone: (803) 254-6542 | Fax: (803) 254-6544  
mrichardson@wyche.com | www.wyche.com/mrichardson | vCard

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From: Catone, Tony [mailto:Tony.Catone@dss.sc.gov]  
Sent: Friday, September 30, 2016 9:29 AM  
To: Matthew T. Richardson <MRichardson@wyche.com>  
Cc: Becky Laffitte <blaffitte@sowellgray.com>; Monty Todd <mtodd@sowellgray.com>; Pisarik, Holly <Holly.Pisarik@dss.sc.gov>; Whittle, Amanda <Amanda.Whittle@dss.sc.gov>; Butch Bowers <Butch@ButchBowers.com>; richeletaylor@gov.sc.gov  
Subject: RE: Exchange Press Releases?

Matthew,

I don't think we are going to have our press release finalized before Monday—would Monday still suit you all for exchange? I'll get you at least a summary description of the Director's anticipated comments as well.

Quick question: Do Plaintiffs plan on having a press conference or any other press engagement other than a release?

With warm regards,

Tony

Anthony S. H. Catone  
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From: Matthew T. Richardson [mailto:MRichardson@wyche.com]  
Sent: Wednesday, September 28, 2016 12:24 PM  
To: Catone, Tony <Tony.Catone@dss.sc.gov>

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Cc: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>; Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; Pisarik, Holly <[Holly.Pisarik@dss.sc.gov](mailto:Holly.Pisarik@dss.sc.gov)>; Whittle, Amanda <[Amanda.Whittle@dss.sc.gov](mailto:Amanda.Whittle@dss.sc.gov)>; Butch Bowers <[Butch@ButchBowers.com](mailto:Butch@ButchBowers.com)>; [richeletaylor@gov.sc.gov](mailto:richeletaylor@gov.sc.gov); Matthew T. Richardson <[MRichardson@wyche.com](mailto:MRichardson@wyche.com)>  
Subject: RE: Exchange Press Releases?

Yes, and thank you for asking. We would be happy to--what about by Friday? It will likely be similar to the last one around the preliminary approval hearing. On another issue, is there anything we need to be prepared for regarding the Director's comments that she will make at the hearing? We look forward to getting past this final litigation hurdle, so please do not hesitate to let us know anything that can make smoothly. Thanks, Matthew

----- Original message -----

From: "Catone, Tony" <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)>

Date: 9/28/16 11:57 AM (GMT-05:00)

To: "Matthew T. Richardson" <[MRichardson@wyche.com](mailto:MRichardson@wyche.com)>

Cc: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>, Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>, "Pisarik, Holly" <[Holly.Pisarik@dss.sc.gov](mailto:Holly.Pisarik@dss.sc.gov)>, "Whittle, Amanda" <[Amanda.Whittle@dss.sc.gov](mailto:Amanda.Whittle@dss.sc.gov)>, Butch Bowers <[Butch@ButchBowers.com](mailto:Butch@ButchBowers.com)>, [richeletaylor@gov.sc.gov](mailto:richeletaylor@gov.sc.gov)

Subject: Exchange Press Releases?

Dear Matthew,

Hope all is well with you. The question has arisen whether Plaintiffs would be amenable to exchanging press releases for comment prior to the hearing next week, as we did last time when the settlement agreement was filed. Please let us know once you've had an opportunity to discuss.

With warm regards,

Tony

Anthony S. H. Catone  
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