

From: Kenneth P. Woodington <kwoodington@DML-LAW.com>
To: 'Addison, Dorothy' Dorothy.Addison@dss.sc.gov
Pisarik, HollyHollyPisarik@gov.sc.gov
Catone, TonyTony.Catone@dss.sc.gov
CC: William H. Davidson II wdavidson@DML-LAW.com
Bailey, KaramaKarama.Bailey@dss.sc.gov
Date: 3/21/2016 10:10:15 AM
Subject: RE: Bilbro--draft affidavit, and filngs by other defendants

That's the right address—see you then.

From: Addison, Dorothy [mailto:Dorothy.Addison@dss.sc.gov]
Sent: Monday, March 21, 2016 9:54 AM
To: Kenneth P. Woodington; HollyPisarik@gov.sc.gov; Catone, Tony
Cc: William H. Davidson II; Bailey, Karama
Subject: RE: Bilbro--draft affidavit, and filngs by other defendants

I can meet tomorrow at 2:30. Is 1611 Devonshire Drive the correct office address?

Dorothy

Dorothy A. Addison, State Refugee Coordinator
Office of Economic Services
SC Department of Social Services
1535 Confederate Ave. Ext.
P.O. Box 1520
Columbia, SC 29202-1520
Ph: 803-898-0989
Fax: 803-898-7156
Email: dorothy.addison@dss.sc.gov



Disclaimer: Please do not use this e-mail address to report child or adult abuse and neglect. The abuse/neglect hotline number for your county is located on the SCDDS home web page at www.dss.sc.gov. For emergencies, please contact your local law enforcement office.

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 21, 2016 8:55 AM
To: Addison, Dorothy <Dorothy.Addison@dss.sc.gov>; HollyPisarik@gov.sc.gov; Catone, Tony <Tony.Catone@dss.sc.gov>
Cc: William H. Davidson II <wdavidson@DML-LAW.com>; Bailey, Karama <Karama.Bailey@dss.sc.gov>
Subject: RE: Bilbro--draft affidavit, and filngs by other defendants

I think we just need to meet with Dorothy. Tuesday works for us. Dorothy, how about if you come over here (Middleburg) at a time of your choosing? Let us know what time works.

Thanks,

Ken

From: Addison, Dorothy [<mailto:Dorothy.Addison@dss.sc.gov>]
Sent: Friday, March 18, 2016 2:03 PM
To: Kenneth P. Woodington; HollyPisarik@gov.sc.gov; Catone, Tony
Cc: William H. Davidson II; Bailey, Karama
Subject: RE: Bilbro--draft affidavit, and filngs by other defendants

Hello,

If needed, I'll be available most of the day on Monday and Tuesday. On Wednesday I'm available in the afternoon. I will be out of the office Thursday & Friday next week.

Dorothy

Dorothy A. Addison, State Refugee Coordinator
Office of Economic Services
SC Department of Social Services
1535 Confederate Ave. Ext.
P.O. Box 1520
Columbia, SC 29202-1520
Ph: 803-898-0989
Fax: 803-898-7156
Email: dorothy.addison@dss.sc.gov



Disclaimer: Please do not use this e-mail address to report child or adult abuse and neglect. The abuse/neglect hotline number for your county is located on the SCDDS home web page at www.dss.sc.gov. For emergencies, please contact your local law enforcement office.

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: Friday, March 18, 2016 9:43 AM
To: HollyPisarik@gov.sc.gov; Catone, Tony <Tony.Catone@dss.sc.gov>
Cc: William H. Davidson II <w davidson@DML-LAW.com>; Addison, Dorothy <Dorothy.Addison@dss.sc.gov>
Subject: Bilbro--draft affidavit, and filngs by other defendants

Holly and Tony, attached are the Motions to Dismiss filed yesterday by the other two defendants in the Bilbro case. In general, my draft summary judgment motion, which is close to being complete, is along the same lines, but will have the added benefit of a supporting affidavit from Dorothy Addison.

A draft version of the affidavit is attached. Much of it is taken from the RRP Backgrounder, with some changes and some rearranging.

Will and I believe it would be helpful if we could meet next week with Ms. Addison (and whoever else would like to attend) in order to finalize the affidavit. I'm pretty open most of the week. If all could advise as to their availability, we can proceed from there to set up the meeting.

I'm not in the office today, but will be checking e-mail regularly.

Thanks,

Ken