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Date: 5/23/2016 10:57:04 AM

Subject: Bilbro status conference at 3 this afternoon (e-mail 1 of 2)

Attachments: ECF No. 40 (reduced file size) (00849856xBE0C9).pdf

ECF 40-1(reduced file size) (00849855xBE0C9).pdf

ECF No. 41 (reduced file size) (00849849xBE0C9).pdf

ECF No. 42 (reduced file size) (00849845xBE0C9).pdf

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Holly and Tony, just a reminder that the status conference before Judge Anderson is at 3 this afternoon. Neither one of you really needs to be there, but let me know if you are planning to attend. Will and I will both be present.

On Friday, we received four more filings from Ms. Martel. They are attached to this e-mail. None of them make any more sense than anything else she's filed. She cites Exodus v. Pence, which is the 2016 Indiana federal case where a private resettlement agency was held to have standing to sue the Governor, who had directed state agencies not to pay federal resettlement funds for services to Syrian refugees. The case is therefore completely inapposite.

Ms. Martel sent an e-mail to all defendants late last week offering to withdraw her motion to remand if we would consent to the filing of another Amended Complaint. Will and I wrote her on Friday and asked her to send a copy of any proposed Amended Complaint for us to review. Nothing was sent, but I expect her to ask Judge Anderson to allow her to file another Amended Complaint. Our position will be that we can take no position unless we have a chance to review any such amendment to see whether it would be futile for her to be permitted to file it.

Ken