

From: Pisarik, Holly  
To: Schimsa, Rebecca <RebeccaSchimsa@gov.sc.gov>  
CC: Patel, Swati <SwatiPatel@gov.sc.gov>  
Date: 7/18/2016 3:40:49 PM  
Subject: RE: Bilbro v. Haley, et al.

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Ken Woodington represents us in this matter. I have not yet seen any bills from them. When you return, please determine how much we have exhausted of our pre-paid policy on the DSS case experts and what our balance is.

Thanks.

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From: Schimsa, Rebecca  
Sent: Wednesday, July 13, 2016 12:06 PM  
To: Pisarik, Holly  
Cc: Patel, Swati  
Subject: FW: Bilbro v. Haley, et al.

Holly – Danny Parris with the IRF sent the notice below about pre-paid legal for the Bilbro matter.

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From: Parris, Danny  
Sent: Wednesday, July 13, 2016 10:17 AM  
To: Patel, Swati; Schimsa, Rebecca; Catone, Tony ([Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)); Dunlap, Melissa; Ganjehsani, Warren V. ([WGanjehsani@SCDPS.GOV](mailto:WGanjehsani@SCDPS.GOV)); Keel, Mark; Whitsett, Adam; Harleston, John; Erwin, Rachel; [wcartled@ed.sc.gov](mailto:wcartled@ed.sc.gov); Gore, Marcus K. ([MarcusGore@SCDPS.GOV](mailto:MarcusGore@SCDPS.GOV))  
Cc: Steve Lynch; Harley Kirkland ([HKirkland@scag.gov](mailto:HKirkland@scag.gov))  
Subject: Bilbro v. Haley, et al.

RE: C.A. No. 3:16-0767-JFA

Good morning, everyone. I think most of you have either seen or perhaps been served with this lawsuit. This matter is one that your tort liability policy with the Fund will not cover as the Fund cannot provide the relief requested. This does, of course, qualify for supplemental defense costs coverage (pre-paid legal) which is available to all of your agencies is varying amounts.

I will as soon as possible be sending you a letter of denial along with the offer to use your pre-paid to help defray the costs of defense. While the Fund makes no recommendations as to defense counsel, Davidson & Lindemann, P.A. have been working on this matter prior to it becoming a federal filing and stand ready if needed.

Very best regards,

**Danny**

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