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Date: 9/20/2016 1:33:18 PM

Subject: RE: ATTORNEY-CLIENT CONFIDENTIAL: Michelle H. - Joint Motion  
Corrections/Affirmations

Attachments: 6734-1500 JOINT MOTION AND MEMORANDUM IN SUPPORT OF JOINT  
(A0941591xA08D7).docx

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We have included Amanda's revisions in the attached. Please let us know if there are any further requested revisions. If not, we will plan to send this to Steve Suggs around 4:00 this afternoon.



ROBIN OWENS LEGAL ASSISTANT **VCARD**

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**SUPPORTING GREEN. PLEASE PRINT WISELY.**

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From: Becky Laffitte

Sent: Tuesday, September 20, 2016 9:54 AM

To: Whittle, Amanda <Amanda.Whittle@dss.sc.gov>; Robin Owens <rowens@sowellgray.com>; Monty Todd <mtodd@sowellgray.com>; Becky Laffitte <blaffitte@sowellgray.com>

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Subject: Re: ATTORNEY-CLIENT CONFIDENTIAL: Michelle H. - Joint Motion Corrections/Affirmations

Amanda

Carenn is on vacation and I am in Anderson in depositions. Therefore, I would ask that any additional changes be sent to Robin Owens.

I will ask Robin to redline these changes on the current redlined version I prepared yesterday while waiting on any other changes. My apologies again for jumping the gun! Have a great day Thanks

Sent from my iPad

On Sep 20, 2016, at 9:39 AM, Whittle, Amanda <[Amanda.Whittle@dss.sc.gov](mailto:Amanda.Whittle@dss.sc.gov)> wrote:

Good morning,

I checked the numbers following our discussion yesterday.

P. 3            The number 8501 is correct.

P. 3            The number 1694 is NOT correct. That number should be 1614. The number 1614 was reported on both -15-16 and 8-18-16 affidavits.

p. 3            The Class Members who received notice (as required by the notice order) were age 14 and older, not 12 and older.

P. 19           The number 3900 is correct as the number of children in foster care on the last day of the 2014-15 fiscal year according to the DSS Child Welfare Flow Chart SFY 2015 which is on the DSS website.

Throughout the order, when references are made to placement of "6 and under" children in congregate care, that reference should be to children who are "6 and under," not "under 6." Examples of this are on pages 6 and 10. This supports the idea of having the motion not reiterate or summarize the agreement but rather state the arguments for approving the agreement.

Thank you,  
Amanda

*Amanda F. Whittle  
Assistant General Counsel  
Office of General Counsel  
S.C. Dept. of Social Services*

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