

From: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>  
To: Justice Corrigan [justicecorrigan@hotmail.com](mailto:justicecorrigan@hotmail.com)  
CC: Carenn Moore [cmoore@sowellgray.com](mailto:cmoore@sowellgray.com)  
Andy Barclay [andy@fosteringcourtimprovement.org](mailto:andy@fosteringcourtimprovement.org)  
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Shackelford, John [John.Shackelford@dss.sc.gov](mailto:John.Shackelford@dss.sc.gov)  
Date: 11/13/2015 5:10:17 PM  
Subject: RE: Defendants Counter Proposals November 13

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Thanks to Andy...it's no longer confusing. Another draft on the way...thanks to all

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From: Justice Corrigan [<mailto:justicecorrigan@hotmail.com>]  
Sent: Friday, November 13, 2015 4:53 PM  
To: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>  
Cc: Carenn Moore <[cmoore@sowellgray.com](mailto:cmoore@sowellgray.com)>; Andy Barclay <[andy@fosteringcourtimprovement.org](mailto:andy@fosteringcourtimprovement.org)>; Page Walley <[PWalley@casey.org](mailto:PWalley@casey.org)>; Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; Michael Montgomery <[mmontgomery@sowellgray.com](mailto:mmontgomery@sowellgray.com)>; Catone, Tony <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)>; Davis, Taron <[Taron.Davis@dss.sc.gov](mailto:Taron.Davis@dss.sc.gov)>; Butch Bowers <[Butch@ButchBowers.com](mailto:Butch@ButchBowers.com)>; Pisarik, Holly <[HollyPisarik@gov.sc.gov](mailto:HollyPisarik@gov.sc.gov)>; Shackelford, John <[John.Shackelford@dss.sc.gov](mailto:John.Shackelford@dss.sc.gov)>  
Subject: Re: Defendants Counter Proposals November 13

Ok I think. It is confusing!

Sent from my iPad

On Nov 13, 2015, at 4:51 PM, Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)> wrote:

Justice Corrigan:

We deleted. Carenn left in plaintiff's d3...Defendant's counter is under that one...somewhat confusing but trying to give everyone a point of reference to all responses

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From: Justice Corrigan [<mailto:justicecorrigan@hotmail.com>]  
Sent: Friday, November 13, 2015 4:03 PM  
To: Carenn Moore <[cmoore@sowellgray.com](mailto:cmoore@sowellgray.com)>  
Cc: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>; Andy Barclay <[andy@fosteringcourtimprovement.org](mailto:andy@fosteringcourtimprovement.org)>; Page Walley <[PWalley@casey.org](mailto:PWalley@casey.org)>; Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; Michael Montgomery <[mmontgomery@sowellgray.com](mailto:mmontgomery@sowellgray.com)>; Catone, Tony <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)>; Davis, Taron <[Taron.Davis@dss.sc.gov](mailto:Taron.Davis@dss.sc.gov)>; Butch Bowers <[Butch@ButchBowers.com](mailto:Butch@ButchBowers.com)>; Pisarik, Holly <[HollyPisarik@gov.sc.gov](mailto:HollyPisarik@gov.sc.gov)>; Shackelford, John <[John.Shackelford@dss.sc.gov](mailto:John.Shackelford@dss.sc.gov)>  
Subject: Re: Defendants Counter Proposals November 13

I do not understand why D.3 a is still in here on Investigations requiring that face to face contact be initiated within 2 to 24 hours? I thought we agreed to strike any reference to anything smelling of

initiation and just stick with completion?

Sent from my iPad

On Nov 13, 2015, at 3:44 PM, Carenn Moore <[cmoore@sowellgray.com](mailto:cmoore@sowellgray.com)> wrote:

This is the final DRAFT that we intend to submit to Children's Rights and Judge Duffy this afternoon. Please call us with any revisions by 4:15 to meet this deadline.

Many thanks to all of you for your assistance.

Becky

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From: Carenn Moore  
Sent: Friday, November 13, 2015 10:22 AM  
To: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>; Andy Barclay <[andy@fosteringcourtimprovement.org](mailto:andy@fosteringcourtimprovement.org)>; Justice Corrigan <[justicecorrigan@hotmail.com](mailto:justicecorrigan@hotmail.com)>; Page Walley <[PWalley@casey.org](mailto:PWalley@casey.org)>  
Cc: Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; Michael Montgomery <[mmontgomery@sowellgray.com](mailto:mmontgomery@sowellgray.com)>; Catone, Tony <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)>; Davis, Taron <[Taron.Davis@dss.sc.gov](mailto:Taron.Davis@dss.sc.gov)>; Butch Bowers <[Butch@ButchBowers.com](mailto:Butch@ButchBowers.com)>; Pisarik, Holly <[HollyPisarik@gov.sc.gov](mailto:HollyPisarik@gov.sc.gov)>; Shackelford, John <[John.Shackelford@dss.sc.gov](mailto:John.Shackelford@dss.sc.gov)>  
Subject: RE: Defendants Counter Proposals November 13

Here is the current DRAFT.

Carenn

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From: Becky Laffitte  
Sent: Friday, November 13, 2015 10:21 AM  
To: Andy Barclay <[andy@fosteringcourtimprovement.org](mailto:andy@fosteringcourtimprovement.org)>; Justice Corrigan <[justicecorrigan@hotmail.com](mailto:justicecorrigan@hotmail.com)>; Page Walley <[PWalley@casey.org](mailto:PWalley@casey.org)>  
Cc: Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>; Carenn Moore <[cmoore@sowellgray.com](mailto:cmoore@sowellgray.com)>; Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; Michael Montgomery <[mmontgomery@sowellgray.com](mailto:mmontgomery@sowellgray.com)>; Catone, Tony <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)>; Davis, Taron <[Taron.Davis@dss.sc.gov](mailto:Taron.Davis@dss.sc.gov)>; Butch Bowers <[Butch@ButchBowers.com](mailto:Butch@ButchBowers.com)>; Pisarik, Holly <[HollyPisarik@gov.sc.gov](mailto:HollyPisarik@gov.sc.gov)>; Shackelford, John <[John.Shackelford@dss.sc.gov](mailto:John.Shackelford@dss.sc.gov)>  
Subject: Defendants Counter Proposals November 13  
Importance: High

Good morning

Given that we didn't receive the word document until 12:01 am, Carenn is finishing the current revisions. We will need to act quickly to offer comments and suggested revisions. John, Andy has indicated we will need your assistance with Therapeutic Foster Care Placements. We would like to conference at 1:30 if possible. Carenn will circulate the call in information. Thanks B

<[image001.jpg](#)>

**Rebecca Laffitte** v-card

Member  
(803) 231-7831  
[www.sowellgray.com](http://www.sowellgray.com)

<[image002.jpg](#)>

Supporting Green. Plea

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