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Subject: Daily Update

The DSS class action defense team met today to discuss a counter proposal to the Plaintiff's Proposal for Interim Relief. The defense team intends to provide a counter to this proposal by Friday of this week to include agreeing for DSS to conduct a workload study, to perform a needs assessment for number of additional foster homes needed in our state, to formulate an immediate plan to remove very young children from congregate care in South Carolina, and to allow the monitors to be involved only to the extent of monitoring these limited provisions. The defense team has an in-person mediation scheduled with the federal mediator, Judge Michael Duffy, and the Plaintiffs in Charleston on September 23 and 24 to continue negotiations of the full Proposed Settlement Agreement.