

From: Andy Barclay <andy@fosteringcourtimprovement.org>

To: Becky Laffitteblaffitte@sowellgray.com
Carenn Moorecmoore@sowellgray.com
Davis, TaronTaron.Davis@dss.sc.gov

CC: Justice Corriganjusticecorrigan@hotmail.com
Page WalleyPWalley@casey.org
Monty Toddmtodd@sowellgray.com
Michael Montgomerymmontgomery@sowellgray.com
Catone, TonyTony.Catone@dss.sc.gov
Butch BowersButch@ButchBowers.com
Pisarik, HollyHollyPisarik@gov.sc.gov
Shackelford, JohnJohn.Shackelford@dss.sc.gov

Date: 11/13/2015 4:49:03 PM

Subject: Re: Defendants Counter Proposals November 13

Just to be sure, this is what I think we want as a counter, please check me on this:

DEFENDANTS' COUNTER PROPOSAL - 11/13/15

D. Investigations of Reports of Abuse or Neglect of Class Members.

D.1 Case Decisions. At least 90% of decisions to "unfound" a report must be based upon DSS ruling out abuse or neglect at the conclusion of an investigation or DSS determining that an investigation did not produce a preponderance of evidence that a Class Member was abused or neglected or that DSS decided not to open an investigation as a result of information received.

D.2 Timely Completion of Investigations Within 45 Days. At least 60% of investigations shall be completed within 45 days of initiation of an investigation, unless the DSS Director or DSS Director's designee authorizes an extension of no more than 15 days upon a showing of good cause.

D.3 Timely Completion of Investigations Within 60 Days. For investigations that have been granted an extension of time to complete, at least 80% shall be completed within 60 days of initiation of an investigation.

Thanks,
Andy

Becky Laffitte wrote:

Thanks a million, Andy. Have a great weekend

From: Andy Barclay [<mailto:andy@fosteringcourtimprovement.org>]

Sent: Friday, November 13, 2015 4:23 PM

To: Becky Laffitte <blaffitte@sowellgray.com>; Carenn Moore <cmoore@sowellgray.com>

Cc: Justice Corrigan <justicecorrigan@hotmail.com>; Page Walley <PWalley@casey.org>; Monty Todd <mtodd@sowellgray.com>; Michael Montgomery <mmontgomery@sowellgray.com>; Catone, Tony <Tony.Catone@dss.sc.gov>; Davis, Taron <Taron.Davis@dss.sc.gov>; Butch Bowers <Butch@ButchBowers.com>;
Pisarik, Holly <HollyPisarik@gov.sc.gov>; Shackelford, John <John.Shackelford@dss.sc.gov>

Subject: Re: Defendants Counter Proposals November 13

Hi Carenn,

Word doc with track changes attached. The sections in Investigations that need to come out completely are highlighted in purple. D1-D3 will need to be renumbered also.

Thanks,
Andy

Becky Laffitte wrote:

Andy

Please call Carenn 803.231.7831 If you make the changes your name will show on the document. We want to keep Carenn as the only name on the revisions. thanks

From: Andy Barclay [<mailto:andy@fosteringcourtimprovement.org>]

Sent: Friday, November 13, 2015 4:05 PM

To: Justice Corrigan <justicecorrigan@hotmail.com>; Carenn Moore <cmoore@sowellgray.com>

Cc: Becky Laffitte <blaffitte@sowellgray.com>; Page Walley <PWalley@casey.org>; Monty Todd <mtodd@sowellgray.com>; Michael Montgomery <mmontgomery@sowellgray.com>; Catone, Tony <Tony.Catone@dss.sc.gov>; Davis, Taron <Taron.Davis@dss.sc.gov>; Butch Bowers <Butch@ButchBowers.com>; Pisarik, Holly <HollyPisarik@gov.sc.gov>; Shackelford, John <John.Shackelford@dss.sc.gov>

Subject: Re: Defendants Counter Proposals November 13

I'm also very confused. I think we need to strike through plaintiffs proposals that we're rejecting. I'll send some edits by 4:15. Please hold off on sending.

Andy

Justice Corrigan wrote:

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> 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

From: Carenn Moore

Sent: Friday, November 13, 2015 10:22 AM

To: Becky Laffitte <blaffitte@sowellgray.com>; Andy Barclay <andy@fosteringcourtimprovement.org>; Justice Corrigan <justicecorrigan@hotmail.com>; Page Walley <PWalley@casey.org>

Cc: Monty Todd <mtodd@sowellgray.com>; Michael Montgomery <mmontgomery@sowellgray.com>; Catone, Tony <Tony.Catone@dss.sc.gov>; Davis, Taron <Taron.Davis@dss.sc.gov>; Butch Bowers <Butch@ButchBowers.com>; Pisarik, Holly <HollyPisarik@gov.sc.gov>; Shackelford, John <John.Shackelford@dss.sc.gov>

Subject: RE: Defendants Counter Proposals November 13

Here is the current DRAFT.

Carenn

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



Rebecca Laffitte v-card
Member
(803) 231-7831
www.sowellgray.com

<image002.jpg>

Supporting

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<6734-1500 DEFENDANTS' DRAFT OF SETTLEMENT AGREEMENT - 11-13-15 (A0829372xA08D7).docx>

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