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Date: 9/13/2016 1:13:07 PM
Subject: RE: Michelle H. v. Haley: Email submissions and Prep for Final Hearing September 13

Good afternoon, Matthew:

We appreciate you taking time to discuss with us the proposed Joint Motion; the attachments to be sent to Judge Gergel and the anticipated protocol for the hearing on October 4. We look forward to receiving the draft Motion for Final Approval of the Class Action Settlement Agreement and for the opportunity to provide any comments prior to filing. Please note that Holly Pisarik and Richele Taylor have been included on this email and should receive all future communications, as well. Best, Becky

From: Matthew T. Richardson [mailto:MRichardson@wyche.com]
Sent: Monday, September 12, 2016 12:19 PM
To: Whittle, Amanda <Amanda.Whittle@dss.sc.gov>; Stephen Suggs <SSuggs@scjustice.org>; Catone, Tony <Tony.Catone@dss.sc.gov>; Butch Bowers <Butch@ButchBowers.com>; Monty Todd <mtodd@sowellgray.com>; Becky Laffitte <blaffitte@sowellgray.com>; Sue Berkowitz <SBerk@scjustice.org>; ilustbader@childrensrights.org; Christina Remlin <cremlin@childrensrights.org>; Carenn Moore <cmoore@sowellgray.com>; Robin Owens <rowens@sowellgray.com>
Cc: Matthew T. Richardson <MRichardson@wyche.com>
Subject: Michelle H. v. Haley: Email submissions and Prep for Final Hearing

Good afternoon,

We wanted to provide an update and look toward the Final Hearing on October 4.

1. Attached are copies of all the emails received at the DSS Settlement email address that we included in the Notice.
2. We will be sending within 48 hours a complete draft of the Joint Motion for Final Approval of the Class Action Settlement Agreement. We believe we need to file this next Tuesday, September 20, which is two weeks before the Final Hearing. We ask that you set aside some time this Wednesday afternoon-Sunday to review so that any changes may be made on Monday, if necessary.

3. By Monday, September 19, we need to submit to Judge Gergel the written submissions received in response to the Notice. We plan to email them to Judge Gergel via his ECF email and include all letters and emails received. Please forward us any that you have received that have not already been forwarded to us.

Last, we will not be filing these written submissions because of the personal information (including personally identifying information of minor children, medical histories, and allegations of abuse and neglect in custody) contained in many of the written submissions and because the Notice did not say they would be filed and publicly available, only that they would be shared with the Court. Let us know if you have any problem with this approach.

Please also let us know of anything else we need to address before the Final Hearing.

Sincerely,
Matthew

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Thank you.
