

**From:** Glaccum, David <DavidGlaccum@gov.sc.gov>  
**To:** Adams, Chaney <ChaneyAdams@gov.sc.gov>  
Pisarik, Holly <HollyPisarik@gov.sc.gov>  
**CC:** Godfrey, Rob <RobGodfrey@gov.sc.gov>  
**Date:** 4/7/2016 3:16:52 PM  
**Subject:** RE: District Court lawsuit and summary judgement request

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I defer to Holly on whether we should respond, but if we do below is a suggested response. For what it's worth, I think the questions are silly and don't need to be responded to.

"Summary judgement was filed because in our opinion, this case is pretty clear-cut. We do not think there is no genuine dispute of material fact, and therefore we are entitled to judgment as a matter of law. We sued to enforce the statute, including recovery of fees, and expect to recover the fees when we win the suit."

-----Original Message-----

**From:** Adams, Chaney  
**Sent:** Thursday, April 07, 2016 2:43 PM  
**To:** Glaccum, David; Pisarik, Holly  
**Cc:** Godfrey, Rob  
**Subject:** FW: District Court lawsuit and summary judgement request

Holly and David,

What do you all think here?

-----Original Message-----

**From:** Biles, DeDe [mailto:dbiles@aikenstandard.com]  
**Sent:** Thursday, April 07, 2016 2:28 PM  
**To:** Adams, Chaney  
**Subject:** District Court lawsuit and summary judgement request

Hi Chaney,

We are working on a story about the request by the State of South Carolina for summary judgement in its favor in the lawsuit concerning MOX, plutonium shipments and the fines that are continuing to accrue (Civil Action No. 1:16-00391-JMC).

We have some questions:

1. Why was the decision made to ask for a summary judgement?
2. Do you think it is likely that these fines will ever be paid to the State of South Carolina ? Why or why not?

My telephone number is 803-644-2390. My email is dbiles@aikenstandard.com.

Thank you,

Dede Biles  
Reporter  
Aiken Standard