

From: Pisarik, Holly
To: Kenneth P. Woodington <kwoodington@DML-LAW.com>
Catone, Tony <Tony.Catone@dss.sc.gov> (Tony.Catone@dss.sc.gov) <Tony.Catone@dss.sc.gov>
CC: William H. Davidson II <wdavidson@DML-LAW.com>
Date: 7/6/2016 2:14:23 PM
Subject: RE: Bilbro - motion for extension of time

I am fine with a "me too" response to this motion.

From: Kenneth P. Woodington [mailto:kwoodington@DML-LAW.com]
Sent: Wednesday, July 06, 2016 1:59 PM
To: Pisarik, Holly; Catone, Tony <Tony.Catone@dss.sc.gov> (Tony.Catone@dss.sc.gov)
Cc: William H. Davidson II
Subject: FW: Bilbro - motion for extension of time

Holly and Tony—While the deadline for answering or moving to dismiss the Amended Complaint is July 18, the current deadline for responding to the motion for preliminary injunction is July 8. The private defendants are going to file the attached motion to extend the time for the PI response until early August. This will allow the defendants to set forth their grounds for dismissing the entire case first. I assume you both are OK with me filing a "me too" response to this, but please confirm.

As an aside, we have been asked by SLED and DHEC to represent them as well. I've been contacted by the lawyer for the State Treasurer, but that representation has not been confirmed yet. There are still about 5 other state agencies named in the Amended Complaint that we haven't heard from.

Thanks,

Ken

From: Kristen Horne [mailto:Kristen.Horne@nelsonmullins.com]
Sent: Wednesday, July 06, 2016 10:35 AM
To: Kenneth P. Woodington
Cc: Kristi Graunke (Kristi.Graunke@splcenter.org); Stephen Suggs (SSuggs@scjustice.org); Sam Outten
Subject: Bilbro - motion for extension of time

Ken,

World Relief and LSC plan to file the attached motion for an extension of time to respond to the preliminary injunction motion today. We are reaching out to Ms. Martel to determine if she will consent, and will finalize that portion of the motion prior to filing.

Thank you.
Kristen

Nelson Mullins

Kristen E. Horne
Of Counsel
kristen.horne@nelsonmullins.com

Nelson Mullins Riley & Scarborough LLP
Meridian, 17th Floor
1320 Main Street, Columbia, SC 29201

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