

From: Kenneth P. Woodington <kwoodington@DML-LAW.com>  
To: 'Addison, Dorothy'Dorothy.Addison@dss.sc.gov  
Pisarik, HollyHollyPisarik@gov.sc.gov  
Catone, TonyTony.Catone@dss.sc.gov  
CC: William H. Davidson IIwdavidson@DML-LAW.com  
Bailey, KaramaKarama.Bailey@dss.sc.gov  
Date: 3/21/2016 8:54:42 AM  
Subject: RE: Bilbro--draft affidavit, and filings by other defendants

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I think we just need to meet with Dorothy. Tuesday works for us. Dorothy, how about if you come over here (Middleburg) at a time of your choosing? Let us know what time works.

Thanks,

Ken

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From: Addison, Dorothy [mailto:Dorothy.Addison@dss.sc.gov]  
Sent: Friday, March 18, 2016 2:03 PM  
To: Kenneth P. Woodington; HollyPisarik@gov.sc.gov; Catone, Tony  
Cc: William H. Davidson II; Bailey, Karama  
Subject: RE: Bilbro--draft affidavit, and filings by other defendants

Hello,

If needed, I'll be available most of the day on Monday and Tuesday. On Wednesday I'm available in the afternoon. I will be out of the office Thursday & Friday next week.

Dorothy

*Dorothy A. Addison*, State Refugee Coordinator  
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SC Department of Social Services  
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From: Kenneth P. Woodington [mailto:kwoodington@DML-LAW.com]  
Sent: Friday, March 18, 2016 9:43 AM

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To: [HollyPisarik@gov.sc.gov](mailto:HollyPisarik@gov.sc.gov); Catone, Tony <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)>

Cc: William H. Davidson II <[wdavidson@DML-LAW.com](mailto:wdavidson@DML-LAW.com)>; Addison, Dorothy <[Dorothy.Addison@dss.sc.gov](mailto:Dorothy.Addison@dss.sc.gov)>

Subject: Bilbro--draft affidavit, and filings by other defendants

Holly and Tony, attached are the Motions to Dismiss filed yesterday by the other two defendants in the Bilbro case. In general, my draft summary judgment motion, which is close to being complete, is along the same lines, but will have the added benefit of a supporting affidavit from Dorothy Addison.

A draft version of the affidavit is attached. Much of it is taken from the RRP Backgrounder, with some changes and some rearranging.

Will and I believe it would be helpful if we could meet next week with Ms. Addison (and whoever else would like to attend) in order to finalize the affidavit. I'm pretty open most of the week. If all could advise as to their availability, we can proceed from there to set up the meeting.

I'm not in the office today, but will be checking e-mail regularly.

Thanks,

Ken