

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 filngs by other defendants

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

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 filngs 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
Office of Economic Services
SC Department of Social Services
1535 Confederate Ave. Ext.
P.O. Box 1520
Columbia, SC 29202-1520
Ph: 803-898-0989
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From: Kenneth P. Woodington [mailto:kwoodington@DML-LAW.com]
Sent: Friday, March 18, 2016 9:43 AM

To: HollyPisarik@gov.sc.gov; Catone, Tony <Tony.Catone@dss.sc.gov>

Cc: William H. Davidson II <wdavidson@DML-LAW.com>; Addison, Dorothy <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