

From: Emory Smith <ESmith@scag.gov>
To: Roland Franklin rfranklin@sowellgray.com
Pisarik, Holly HollyPisarik@gov.sc.gov
Date: 10/16/2015 10:53:16 AM
Subject: RE: Petition to Vacate Supplemental Order - Abbeville

Holly, when will you be able to send the section for the Governor?

Thanks.

Emory

From: Roland Franklin [<mailto:rfranklin@sowellgray.com>]
Sent: Friday, October 16, 2015 10:52 AM
To: Emory Smith
Subject: RE: Petition to Vacate Supplemental Order - Abbeville

Emory:

I just wanted to check back with you regarding the Governor's portion of the Petition. Is it still in the works?

Roland

From: Emory Smith [<mailto:ESmith@scag.gov>]
Sent: Thursday, October 15, 2015 2:39 PM
To: Roland Franklin <rfranklin@sowellgray.com>
Subject: RE: Petition to Vacate Supplemental Order - Abbeville

The Governor would also like to join. Will send you a short paragraph soon re her efforts as to education.

Emory

From: Roland Franklin [<mailto:rfranklin@sowellgray.com>]
Sent: Thursday, October 15, 2015 2:03 PM
To: Emory Smith
Subject: RE: Petition to Vacate Supplemental Order

Thanks, Emory. Working on it now.

From: Emory Smith [<mailto:ESmith@scag.gov>]
Sent: Thursday, October 15, 2015 1:06 PM
To: Roland Franklin <rfranklin@sowellgray.com>
Subject: RE: Petition to Vacate Supplemental Order

Sorry, here it is.

From: Roland Franklin [<mailto:rfranklin@sowellgray.com>]
Sent: Thursday, October 15, 2015 12:08 PM
To: Emory Smith
Subject: RE: Petition to Vacate Supplemental Order

Emory,

I did not receive the attachment.

From: Emory Smith [<mailto:ESmith@scag.gov>]
Sent: Thursday, October 15, 2015 12:05 PM
To: Roland Franklin <rfranklin@sowellgray.com>
Subject: RE: Petition to Vacate Supplemental Order

Thanks.

Attached are minor corrections re citations, punctuation, spacing and quotes for Bob Cook's portion of the Motion. They are redlined in. They do not include the edits I made re the State of SC as a party which I sent you yesterday.

Thanks.

Emory

From: Roland Franklin [<mailto:rfranklin@sowellgray.com>]
Sent: Wednesday, October 14, 2015 5:54 PM
To: Emory Smith
Cc: Bobby Stepp; Betsy Gray; Valerie Hampton; JeffGossett@scsenate.gov; CharlesReid@schouse.gov; Emma Dean; PatrickDennis@schouse.gov; Bob Cook
Subject: RE: Petition to Vacate Supplemental Order

[Emory,](#)

[I agree with your revisions and will incorporate as suggested.](#)

[Roland](#)

From: Emory Smith [<mailto:ESmith@scag.gov>]
Sent: Wednesday, October 14, 2015 5:24 PM
To: Roland Franklin <rfranklin@sowellgray.com>
Cc: Bobby Stepp <rstepp@sowellgray.com>; Betsy Gray <egray@sowellgray.com>; Valerie Hampton <vhampton@sowellgray.com>; JeffGossett@scsenate.gov; CharlesReid@schouse.gov; Emma Dean <EmmaDean@schouse.gov>; PatrickDennis@schouse.gov; Bob Cook <BCook@scag.gov>
Subject: RE: Petition to Vacate Supplemental Order

Roland, I would appreciate your adding the State of SC as a moving party and moving the footnote about the State at the end into the main body. I am concerned that the Court may look with disfavor on an argument contained only in a footnote. I have redlined in these changes in the attachment and hope they are ok. If you'd rather put the State's argument in a different spot, doing so should be ok.

Also below is a signature block for the State that you can paste in, but we'd like to see a final draft before you do so.

Thanks all your work.

Emory

ALAN WILSON
Attorney General

ROBERT D. COOK
Solicitor General
S.C. Bar. No. 1373

J. EMORY SMITH, JR.
Deputy Solicitor General

S.C. Bar No. 5262

Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3680

BY: _____

ATTORNEYS FOR THE STATE OF SOUTH CAROLINA

From: Bob Cook
Sent: Wednesday, October 14, 2015 5:13 PM
To: Roland Franklin; Emory Smith
Cc: Bobby Stepp; Betsy Gray; Valerie Hampton; JeffGossett@scsenate.gov; CharlesReid@schouse.gov; Emma Dean; PatrickDennis@schouse.gov
Subject: RE: Petition to Vacate Supplemental Order

Roland we will cite check the stuff you inserted we sent. Otherwise I am good but I think Emory had a suggestion.

From: Roland Franklin [<mailto:rfranklin@sowellgray.com>]
Sent: Wednesday, October 14, 2015 4:18 PM
To: Emory Smith
Cc: Bobby Stepp; Betsy Gray; Valerie Hampton; JeffGossett@scsenate.gov; CharlesReid@schouse.gov; Bob Cook; Emma Dean; PatrickDennis@schouse.gov
Subject: RE: Petition to Vacate Supplemental Order

That's is fine with us, Emory.

From: Emory Smith [<mailto:ESmith@scag.gov>]
Sent: Wednesday, October 14, 2015 4:12 PM
To: Roland Franklin <rfranklin@sowellgray.com>
Cc: Bobby Stepp <rstepp@sowellgray.com>; Betsy Gray <egray@sowellgray.com>; Valerie Hampton <vhampton@sowellgray.com>; JeffGossett@scsenate.gov; CharlesReid@schouse.gov; Bob Cook <BCook@scag.gov>; Emma Dean <EmmaDean@schouse.gov>; PatrickDennis@schouse.gov
Subject: RE: Petition to Vacate Supplemental Order

Do you have any objection to my forwarding the Petition to Holly Pisarik, the Governor's Chief Counsel for review?

Emory

From: Roland Franklin [<mailto:rfranklin@sowellgray.com>]
Sent: Wednesday, October 14, 2015 4:01 PM
To: JeffGossett@scsenate.gov; CharlesReid@schouse.gov; PatrickDennis@schouse.gov; Emma Dean; Emory Smith; Bob Cook
Cc: Bobby Stepp; Betsy Gray; Valerie Hampton
Subject: Petition to Vacate Supplemental Order

Counsel:

Attached is a draft of the Petition to Vacate Supplemental Order for your review. I look forward to your comments and suggestions for revision.

Roland



Roland M. Franklin [v-card](#)
Attorney

803 231.7826
www.sowellgray.com



Supporting Green. Please print wisely.

NOTICE: This e-mail and any files transmitted with it are confidential and may contain information which is legally privileged or otherwise exempt from disclosure. They are intended solely for the use of the individual or entity to whom this e-mail is addressed. If you are not one of the named recipients or otherwise have reason to believe that you have received this message in error, please immediately notify the sender and delete this message immediately from your computer. Any other use, retention, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.

IRS DISCLAIMER: As required by U.S. Treasury Regulations governing tax practice, you are hereby advised that any written tax advice contained herein was not written or intended to be used (and cannot be used) by any taxpayer for the purpose of avoiding penalties that may be imposed under the Internal Revenue Code.