

From: Robin Owens <rowens@sowellgray.com>

To: Matthew T. RichardsonMRichardson@wyche.com

Becky Laffitteblaffitte@sowellgray.com

Whittle, AmandaAmanda.Whittle@dss.sc.gov

Stephen SuggsSSuggs@scjustice.org

Catone, TonyTony.Catone@dss.sc.gov

Butch BowersButch@ButchBowers.com

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ilustbader@childrensrights.orgilustbader@childrensrights.org

Christina Remlincremlin@childrensrights.org

Carenn Moorecmoore@sowellgray.com

Taylor, RicheleRicheleTaylor@gov.sc.gov

Sarah Coxscox@wyche.com

Date: 9/21/2016 4:41:57 PM

Subject: RE: Michelle H. v. Haley:September 21

Attachments: 6734-1500 JOINT MOTION FROM SSUGGS (w-revisions of Defense Team of 9-21-16) (A0942630xA08D7).docx

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Sent on behalf of Becky Laffitte and Monty Todd

Our apologies. We just received this in hand. The revisions are redlined (Steve revisions are also still redlined) so please accept the changes. Please let us know if you have any questions.



ROBIN OWENS LEGAL ASSISTANT **VCARD**

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**SUPPORTING GREEN. PLEASE PRINT WISELY.**

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From: Matthew T. Richardson [mailto:MRichardson@wyche.com]

Sent: Wednesday, September 21, 2016 4:37 PM

To: Becky Laffitte <blaffitte@sowellgray.com>; Whittle, Amanda <Amanda.Whittle@dss.sc.gov>; Stephen Suggs <SSuggs@scjustice.org>; Catone, Tony <Tony.Catone@dss.sc.gov>; Butch Bowers <Butch@ButchBowers.com>; Monty Todd <mtodd@sowellgray.com>; Sue Berkowitz <SBerk@scjustice.org>; ilustbader@childrensrights.org;

Christina Remlin <cremlin@childrensrights.org>; Carenn Moore <cmoore@sowellgray.com>; Robin Owens <rowens@sowellgray.com>; Taylor, Richele <RicheleTaylor@gov.sc.gov>; Matthew T. Richardson <MRichardson@wyche.com>; Sarah Cox <scox@wyche.com>  
Subject: RE: Michelle H. v. Haley:September 21

Becky et al., We have not heard from you all about any additional changes needed for the Joint Motion. We hope there are none. If there are any, please send them to us or at least let us know there will be some necessary changes by 9 am tomorrow morning. We will file the Joint Motion and attachments tomorrow by noon, unless there are additional requested changes that need to be addressed. Thank you for your work on the Joint Motion so we can get it to Judge Gergel in time for his preparation for the Final Hearing. Sincerely, Matthew

Matthew T. Richardson | Wyche  
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Phone: (803) 254-6542 | Fax: (803) 254-6544  
mrichardson@wyche.com | www.wyche.com/mrichardson | vCard

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From: Becky Laffitte [<mailto:blaffitte@sowellgray.com>]  
Sent: Wednesday, September 21, 2016 3:24 PM  
To: Matthew T. Richardson; Whittle, Amanda; Stephen Suggs; Catone, Tony; Butch Bowers; Monty Todd; Sue Berkowitz; [ilustbader@childrensrights.org](mailto:ilustbader@childrensrights.org); Christina Remlin; Carenn Moore; Robin Owens; Taylor, Richele  
Cc: Becky Laffitte  
Subject: RE: Michelle H. v. Haley:September 21

Good afternoon, Matthew:

Some members of the Defense team are still reviewing Stephen's latest document. We'll return any proposed revisions as soon as they are done. (and we are aware of your desire to file today.) Thanks so much Becky

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From: Matthew T. Richardson [<mailto:MRichardson@wyche.com>]  
Sent: Monday, September 12, 2016 12:41 PM  
To: Matthew T. Richardson <[MRichardson@wyche.com](mailto:MRichardson@wyche.com)>; Whittle, Amanda <[Amanda.Whittle@dss.sc.gov](mailto:Amanda.Whittle@dss.sc.gov)>; Stephen Suggs <[ssuggs@scjustice.org](mailto:ssuggs@scjustice.org)>; Catone, Tony <[Tony.Catone@dss.sc.gov](mailto:Tony.Catone@dss.sc.gov)>; Butch Bowers <[Butch@ButchBowers.com](mailto:Butch@ButchBowers.com)>; Monty Todd <[mtodd@sowellgray.com](mailto:mtodd@sowellgray.com)>; Becky Laffitte <[blaffitte@sowellgray.com](mailto:blaffitte@sowellgray.com)>; Sue Berkowitz <[SBerk@scjustice.org](mailto:SBerk@scjustice.org)>; [ilustbader@childrensrights.org](mailto:ilustbader@childrensrights.org); Christina Remlin <[cremlin@childrensrights.org](mailto:cremlin@childrensrights.org)>; Carenn Moore <[cmoore@sowellgray.com](mailto:cmoore@sowellgray.com)>; Robin Owens <[rowens@sowellgray.com](mailto:rowens@sowellgray.com)>  
Subject: RE: Michelle H. v. Haley: Email submissions and Prep for Final Hearing

CORRECTION: The "Last" paragraph below should have read:

"Last, we will not be filing the written submissions that are not relevant to the final approval of the settlement and that contain personal and confidential information (including personally identifying information of minor children, medical histories, and allegations of abuse and neglect in custody). The Notice did not say all written submissions would be filed and publicly available, only that they would be shared with the Court. Let us know if you have any problem with this approach for these types of written submissions."

You will soon see that the relevant submissions have been addressed in and will be attached to the Joint Motion.

Thanks,  
Matthew

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mrichardson@wyche.com | www.wyche.com/mrichardson | vCard

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From: Matthew T. Richardson  
Sent: Monday, September 12, 2016 12:19 PM  
To: Whittle, Amanda; Stephen Suggs; Catone, Tony; Butch Bowers; Monty Todd; Becky Laffitte; Sue Berkowitz; [ilustbader@childrensrights.org](mailto:ilustbader@childrensrights.org); Christina Remlin; Carenn Moore; Robin Owens  
Cc: Matthew T. Richardson  
Subject: Michelle H. v. Haley: Email submissions and Prep for Final Hearing

Good afternoon,

We wanted to provide an update and look toward the Final Hearing on October 4.

1. Attached are copies of all the emails received at the DSS Settlement email address that we included in the Notice.
2. We will be sending within 48 hours a complete draft of the Joint Motion for Final Approval of the Class Action Settlement Agreement. We believe we need to file this next Tuesday, September 20, which is two weeks before the Final Hearing. We ask that you set aside some time this Wednesday afternoon-Sunday to review so that any changes may be made on Monday, if necessary.
3. By Monday, September 19, we need to submit to Judge Gergel the written submissions received in response to the Notice. We plan to email them to Judge Gergel via his ECF email and include all letters and emails received. Please forward us any that you have received that have not already been forwarded to us.

Last, we will not be filing these written submissions because of the personal information (including personally identifying information of minor children, medical histories, and allegations of abuse and neglect in custody) contained in many of the written submissions and because the Notice did not say they would be filed and publicly available, only that they would be shared with the Court. Let us know if you have any problem with this approach.

Please also let us know of anything else we need to address before the Final Hearing.

Sincerely,  
Matthew

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