

From: Monty Todd <mtodd@sowellgray.com>
To: Catone, TonyTony.Catone@dss.sc.gov
CC: Becky Laffitteblaffitte@sowellgray.com
Pisarik, HollyHollyPisarik@gov.sc.gov
Butch BowersButch@ButchBowers.com
Whittle, AmandaAmanda.Whittle@dss.sc.gov
Maura.Corrigan@AEI.orgMaura.Corrigan@AEI.org
Andy Barclayandy@fosteringcourtimprovement.org
Date: 3/22/2016 7:14:19 PM
Subject: Re: Phasing Proposal

Thanks Tony. Will review and probably send to the plaintiffs early tomorrow morning.

Sent from my iPhone

On Mar 22, 2016, at 7:02 PM, Catone, Tony <Tony.Catone@dss.sc.gov> wrote:

Dear Becky and Monty,

Attached please find the phasing proposal language, which we have put into the most simplistic format we could conceive in order to make it understandable and appear "easy" enough for Plaintiffs to agree with. As you know, it took us significant thought processes to first conceive of what was needed in order to implement the target measures and then boil down the overall mechanics / concept to only what would be necessary to include in the Settlement Agreement.

We welcome any feedback from the Defense Team, and our hope is that we can get this proposal (or any revised proposal based on Team input) to the Plaintiffs as soon as possible.

Tony

Anthony S. H. Catone
General Counsel
South Carolina Department of Social Services

Office of General Counsel
P.O. Box 1520
Columbia, SC 29202-1520

Office Phone: (803) 898-7368
Fax: 803-898-7245

Email: tony.catone@dss.sc.gov

Privacy Notice: This message may contain information that is protected from disclosure by federal and/or state law, or is otherwise privileged or confidential. This communication is intended only for the use of the individual or entity to whom it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering this message to the recipient, you are hereby notified that any dissemination, distribution, or copying of this message is strictly prohibited and violations of applicable federal and/or state law may subject you to civil and/or criminal penalties. If you have received this message in error, please notify the sender immediately by telephone and delete this message.

