

# Nelson Mullins

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June 30, 2016

**RECEIVED**

JUL 05 2016

**S.C. SUPREME COURT**

The Honorable Daniel E. Shearouse  
Clerk of Court  
South Carolina Supreme Court  
1231 Gervais Street  
Columbia, SC 29211

RE: Abbeville County School District, et al. v. State of South Carolina, et al.  
Civil Action No. 93-CP-31-169  
Court of Appeals Case Tracking No. 2007-065159  
Our File No. 11884/01500

Dear Mr. Shearouse:

In the Court's Order of November 5, 2015, the State was required to submit a report on steps taken to cure the constitutional defects identified in the *Abbeville* decision of November 12, 2014. Specifically, the Defendants were required to submit a written summary to the Court "detailing their efforts to implement a constitutionally compliant education system, including all proposed, pending, or enacted legislation," along with an expected timeline for implementation of the proposed plan. (Order, at 7.) The South Carolina House of Representatives and Senate issued a joint report on June 29, 2016.

The November 5, 2015 Order does not specify whether the Plaintiffs were to provide any response to the State's report. However, we would like to provide a formal response. If that is acceptable, we propose a due date of three weeks from the date we are notified.

Would you please offer us guidance on whether we can provide a response, and if so, a due date for the response?

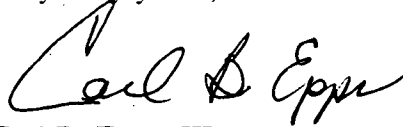
Thank you very much for your help.

The Honorable Daniel E. Shearouse

June 30, 2016

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Very truly yours,

A handwritten signature in cursive script that reads "Carl B. Epps, III". The signature is written in black ink and is positioned above the printed name.

Carl B. Epps, III

CBEIII:ljs

cc: Robert E. Stepp, Esquire (via electronic mail and U.S. Mail)  
Elizabeth Van Doren Gray, Esquire (via electronic mail and U.S. Mail)  
J. Emory Smith, Jr., Esquire (via electronic mail and U.S. Mail)  
Swati Patel, Esquire (via electronic mail and U.S. Mail)