

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

AIMEE MADDONNA,

*Plaintiff,*

v.

U.S. DEPARTMENT OF HEALTH AND  
HUMAN SERVICES, *et al.*

*Defendants.*

Civil Docket No. 6:19-cv-448-TMC

**UNOPPOSED MOTION TO EXTEND PLAINTIFF'S TIME TO RESPOND TO  
DEFENDANT McMASTER'S MOTION TO DISMISS**

Pursuant to Local Rule 6.01, Plaintiff Aimee Maddonna moves the Court to extend the time for responding to Defendant Henry McMaster's Motion to Dismiss [DKT No. 12].

1. The current deadline for responding to Defendant McMaster's Motion is April 2, 2019.
2. This deadline has not previously been extended.
3. Plaintiff requests 14 additional days, to and including Tuesday, April 16, 2019, to respond.
4. Granting this extension will not affect any other deadlines in this case. No scheduling order yet has been entered in the case as the remaining Defendants' deadlines to file answers (or other responsive filings) have not run and the case is not yet at issue. Defendant Joan Meacham's answer date is April 9, 2019 (per previous extension). The remaining federal defendants' answers are currently due on April 26, 2019.

5. Statement of Reasons for Motion. Defendant McMaster, sued in his capacity as Governor of South Carolina, moved to dismiss Plaintiff's Complaint on standing grounds and for failure to state a claim. Plaintiff's response to his motion is due Tuesday, April 2. The other State Defendant, Joan Meacham, sued in her capacity as Acting Director of South Carolina Department of Social Services, has extended her time for answering until April 9. Her counsel has indicated an intent to file a motion to dismiss raising similar challenges to this lawsuit. Plaintiff believes filing a single

consolidated response to both motions seems the most efficient presentation for the Court. Counsel for both State Defendants do not object to that proposal. Accordingly, Plaintiff suggested a 14-day extension to respond to Defendant McMaster’s pending motion, which would make Plaintiff’s consolidated response due Tuesday, April 16 (seven days after the deadline for Defendant Meacham’s motion).

6. Compliance with Local Rule 7.02. Counsel for Plaintiff, Kenneth Upton, has conferred with Miles Coleman, counsel for Defendant McMaster, and Kenneth Woodington, counsel for Defendant Meacham, and can affirm this motion is not opposed.

WHEREFORE, Plaintiff moves for a 14-day extension of time to respond to Defendant McMaster’s Motion to Dismiss, to and including Tuesday, April 16, 2019.

Greenville, South Carolina  
March 29, 2019.

s/ Aaron J. Kozloski  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 29, 2019, the foregoing UNOPPOSED MOTION TO EXTEND PLAINTIFF'S TIME TO RESPOND TO DEFENDANT McMASTER'S MOTION TO DISMISS was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to Defendants of record by operation of the Court's electronic filing system.

*s/ Aaron J. Kozloski* \_\_\_\_\_

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