

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

Aimee Maddonna,)	Civil Action No. 6:19-cv-00448-TMC
)	
Plaintiff,)	
)	<u>UNOPPOSED MOTION FOR</u>
v.)	<u>EXTENSION OF TIME TO REPLY</u>
)	
United States Department of Health and)	
Human Services, et al.,)	
)	
Defendants.)	

Pursuant to Local Rules 6.01 and, alternatively, 12.01, Defendant Henry McMaster, in his official capacity as Governor of South Carolina, requests a seven-day extension of time in which to file a Reply in Support of his Motion to Dismiss (ECF No. 12). Counsel for the parties who have appeared in the instant proceeding have no objection to the requested extension. *See* Exhibit A. This is Governor McMaster’s first request for an extension to file the Reply. At present, Governor McMaster’s Reply is due on April 23, 2019. If the extension is granted, the new deadline will be April 30, 2019. If granted, the extension will not affect any other deadline. This request is made due to counsel’s familial obligations and other, concurrent court appearances and filings.

Respectfully submitted

NELSON MULLINS RILEY & SCARBOROUGH LLP

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Attorneys for Governor Henry McMaster

Greenville, South Carolina
April 22, 2019

Miles Coleman

From: Kenneth P. Woodington <kwoodington@DML-LAW.com>
Sent: Thursday, April 18, 2019 9:02 AM
To: 'Ken Upton'; Miles Coleman
Cc: Ethan Bercot; Jay Thompson; bcook@scag.gov; William H. Davidson II; Sarah Goetz; Richard Katskee; aaron@capitolcounsel.us
Subject: RE: Maddonna v. HHS: -- request for agreed extension of time for Reply

Miles, obviously we don't oppose either.

Ken

From: Ken Upton [mailto:upton@au.org]
Sent: Thursday, April 18, 2019 12:44 AM
To: Miles Coleman
Cc: Ethan Bercot; Jay Thompson; bcook@scag.gov; Kenneth P. Woodington; William H. Davidson II; Sarah Goetz; Richard Katskee; aaron@capitolcounsel.us
Subject: RE: Maddonna v. HHS: -- request for agreed extension of time for Reply

Miles,

Plaintiff does not oppose your requested extension. Enjoy the rest of your vacation.

-Ken



Kenneth D. Upton, Jr.*
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*Admitted in Texas and Oklahoma only. Supervised by Richard B. Katskee, a member of the D.C. Bar.

From: Miles Coleman <Miles.Coleman@nelsonmullins.com>
Sent: Wednesday, April 17, 2019 11:04 PM
To: Sarah Goetz <goetz@au.org>; Richard Katskee <katskee@au.org>; Ken Upton <upton@au.org>; aaron@capitolcounsel.us
Cc: Ethan Bercot <ethan.bercot@nelsonmullins.com>; Jay Thompson <Jay.Thompson@nelsonmullins.com>; bcook@scag.gov; kwoodington@dml-law.com; wdavidson@dml-law.com
Subject: Maddonna v. HHS: -- request for agreed extension of time for Reply

Counsel,

By my calculations, the Governor's Reply memorandum in support of the Motion to Dismiss is due on Tuesday, April 23. I am writing to inquire whether, pursuant to Local Rule 12.01, you will agree to a seven-day extension of that deadline. I am currently on vacation with my family, and my colleague Jay is likewise vacationing with his family this week. I'll return home this weekend, but am scheduled to argue a hearing and conduct a trial before an administrative agency on the 23rd, followed by a mediation in another case on the 24th.

If you are agreeable to a seven-day extension, I'll file something informing the Court of the parties' agreement and, in the alternative, requesting a seven-day extension of time. Thank you for considering,

Miles

[Redacted Signature]

MILES COLEMAN **PARTNER**

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