

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

Eden Rogers and Brandy Welch,)
)
 Plaintiff,)

Civil Action No.
6:19-cv-01567-TMC

v.)

United States Department of Health and)
Human Services; Alex Azar, in his official)
capacity as Secretary of the United States)
Department of Health and Human)
Services; Administration for Children and)
Families; Lynn Johnson, in her official)
capacity as Assistant Secretary of the)
Administration for Children and Families;)
Steven Wagner, in his official capacity as)
Principal Deputy Assistant Secretary of)
the Administration for Children and)
Families; Henry McMaster, in his official)
capacity as Governor of the State of South)
Carolina; and Michael Leach, in his)
official capacity as State Director of the)
South Carolina Department of Social)
Services,)

**CONSENT
MOTION FOR EXTENSION OF TIME IN
WHICH TO ANSWER OR OTHERWISE
PLEAD**

Defendants.)
)
_____)

Defendant Michael Leach, in his official capacity as State Director of the South Carolina Department of Social Services, and with the consent of opposing counsel, hereby moves for an extension of time in which to answer or otherwise plead, to and through **July 30, 2019**. As indicated in the PACER file for this case, ECF No. 2, that is the date the responses of the Federal Defendants are due. This Defendant’s Answer or other response is currently due on June 26, 2019.

The grounds for this motion are that the Complaint is long and complex, and the case involves issues of public importance. In addition, the case would not be delayed by permitting this extension, since the Federal Defendants' responses are not due until July 30.

Undersigned counsel has consulted with Susan Dunn, one of the attorneys for Plaintiffs in this action, who has advised that Plaintiffs' counsel consent to an extension until the same day as the response of the Federal Defendants is due, that is, by July 30, 2019.¹

For the foregoing reasons, this Defendant accordingly requests that an extension until July 30, 2019, be granted.

Respectfully submitted,

DAVIDSON, WREN & PLYLER P.A.

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*Counsel for Defendant Michael Leach, in
his official capacity as State Director of the
South Carolina Department of Social
Services*

Columbia, South Carolina

June 25, 2019

¹ ECF Nos. 15 and 16 could be read to suggest that the Federal Defendants' Answers are due on August 5, but that date is based on service of the Office of the U.S. Attorney for South Carolina, which is not a separate defendant, but merely an entity to be served.