

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

Eden Rogers et al.,)	
)	Civil Action No. 6:19-cv-01567-TMC
Plaintiffs,)	
)	<u>DEFENDANT HENRY MCMASTER'S</u>
v.)	<u>SECOND MOTION FOR AN</u>
United States Department of Health and Human Services et al.,)	<u>EXTENSION OF TIME</u>
)	
Defendants.)	

Defendant Henry McMaster, in his official capacity as Governor of South Carolina, moves for an extension of 30 days in which to respond to Plaintiffs' Complaint. This request is due to the pending Motion to Stay Proceedings recently filed by Governor McMaster. (*See* ECF No. 30.) That motion requests the court enter an order staying the proceedings in this case, including deadlines for responding to the Complaint, until after the court's resolution of dispositive motions filed in a related action, *Maddonna v. United States Dept. of Health and Human Services, et al.*, No. 6:19-cv-00448-TMC (D.S.C.). As explained in the Motion to Stay, deciding the issues raised in the motions pending in *Maddonna* before briefing and addressing similar issues in this suit serves the interests of judicial economy, avoids duplicative briefing, reduces unnecessary hardship on Defendants, avoids prejudice to Plaintiffs, and simplifies matters at issue in this case. These potential benefits may be lost if Defendants are required to respond to the Complaint in the instant proceeding before the court is able to decide the Motion to Stay. Thus, an extension of time is needed to allow the court sufficient time to decide the Motion to Stay before Defendants' responses are due.

Governor McMaster's current deadline is July 30, 2019. (*See* ECF No. 29.) If the extension is granted, the new deadline would be August 29, 2019. This deadline has previously been extended once before with Plaintiffs' consent (*see* ECF Nos. 28, 29), and no other pending

deadlines will be affected. No party will be prejudiced by this extension. Pursuant to Local Civil Rule 7.02 D.S.C., prior to filing this motion, undersigned counsel conferred with opposing counsel who did not consent to this motion.

Respectfully submitted

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