

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

Aimee Maddonna, )  
 )  
 Plaintiff, )  
 )  
 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, Department of Health and )  
 Human Services; 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 Joan B. Meacham, in her official )  
 capacity as Acting State Director of the )  
 South Carolina Department of Social )  
 Services )  
 Defendants. )  
 \_\_\_\_\_ )

Civil Action No.  
6:19-cv-00448-TMC

**REPLY MEMORANDUM IN SUPPORT  
OF  
MOTION TO DISMISS  
  
(Defendant Joan B. Meacham)**

Defendant Joan B. Meacham, in her official capacity as Acting State Director of the South Carolina Department of Social Services, refers to, relies upon, and incorporates by reference ECF No. 33, the Reply Memorandum in Support of Motion to Dismiss filed by Defendant Henry McMaster. This Defendant reiterates that if Defendant McMaster’s Motion to Dismiss were to be granted, it would logically follow that Defendant Meacham should be dismissed for the same reasons.

*[Signature block is on following page]*

Respectfully submitted,

DAVIDSON, WREN & PLYLER P.A.

*s/Kenneth P. Woodington*

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Columbia, South Carolina

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