

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

AIMEE MADDONNA,

Plaintiff,

v.

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

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

Defendants.

**UNOPPOSED MOTION TO EXTEND PARTIES' TIME TO FILE RESPONSE AND
REPLY REGARDING FEDERAL DEFENDANTS' MOTION TO DISMISS**

Pursuant to Local Rule 6.01, Plaintiff Aimee Maddonna moves the Court to extend the current deadlines for plaintiff's opposition response to and federal defendants' reply in support of the *Federal Defendants' Motion to Dismiss* [DKT No. 29] as set forth below:

1. Plaintiff's current deadline for responding to federal defendants' motion is May 10, 2019.
2. This deadline has not previously been extended.
3. Plaintiff requests 14 additional days, to and including Friday, May 24, 2019, to respond.
4. Plaintiff further requests, on behalf of federal defendants, 10 additional days, to and including Monday, June 10, 2019, for federal defendants to file a reply in support of their motion.
5. Granting this extension will not affect any other deadlines in this case. No scheduling order yet has been entered in the case. The state defendants have motions to dismiss pending that have been fully briefed and, therefore, they have not yet filed answers.
6. Statement of Reasons for Motion. Counsel for plaintiff requests additional time to file the response in light of out-of-office time—both planned and unplanned—for staff, as well as filing deadlines in other litigation matters. Counsel for federal defendants requests additional time to file their reply in light of the Memorial Day holiday and previously scheduled vacation plans.

7. Compliance with Local Rule 7.02. Plaintiff’s counsel, Richard B. Katskee, has conferred with federal defendants’ counsel, James R. Powers, who does not oppose this motion.

WHEREFORE, plaintiff moves for a 14-day extension of time to respond to federal defendants’ motion to dismiss, to and including **May 24, 2019**, and a 10-day extension of time for federal defendants to file a reply in support of their motion, to and including **June 10, 2019**.

Greenville, South Carolina
May 1, 2019.

s/ Aaron J. Kozloski
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