

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

EDEN ROGERS and

BRANDY WELCH,

Plaintiffs,

-against-

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,

Defendants.

Case No. 6:19-cv-01567-TMC

**JOINT MOTION FOR
EXTENSIONS OF TIME**

Plaintiffs hereby move for an extension of 15 days in which to respond to the Federal Defendants' motion to dismiss, and an extension of 14 days in which to respond to Defendant Henry McMaster's and Defendant Michael Leach's motions to dismiss. Defendants hereby move for an extension of 7 days in which to reply to Plaintiffs' response. These deadlines have not previously been extended.

The Federal Defendants filed their motion to dismiss on August 29, 2019. (ECF No. 50.) Plaintiffs understand that Defendants McMaster and Leach will move to dismiss the Complaint on August 30, 2019, the deadline by which Defendants must answer the Complaint or otherwise plead (ECF No. 43). Pursuant to the Court's Local Civil Rules 7.06 and 7.07, Plaintiffs' response to these motions currently is due 14 days after service of the motions; i.e., September 12, 2019 for the Federal Defendants' motion, and September 13, 2019 for Defendants McMaster's and Leach's motions. Defendants' replies, if any, are due 7 days later; i.e., September 19, 2019 for the Federal Defendants, and September 20, 2019 for Defendants McMaster and Leach.

If this joint motion is granted, Plaintiffs' response to all Defendants' motions would be due September 27, 2019, and Defendants' replies, if any, would be due October 11, 2019. No other deadlines would be affected by the requested extensions.

The parties seek the requested extensions in light of the number of issues raised by this case and counsel's other litigation deadlines.

For the foregoing reasons, Plaintiffs respectfully request that their time to respond to Defendants' motions to dismiss be extended until September 27, 2019, and Defendants respectfully request that their time to reply be extended until October 11, 2019.

August 30, 2019

Respectfully submitted,

/s/ Susan K. Dunn

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