

**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

**BRIEF OF DEFENDANT  
MICHAEL LEACH,  
IN HIS OFFICIAL CAPACITY AS STATE  
DIRECTOR OF THE SOUTH CAROLINA  
DEPARTMENT OF SOCIAL SERVICES,  
IN RESPONSE TO COURT ORDER<sup>1</sup>**

Defendant Michael Leach, in his official capacity as State Director of the South Carolina Department of Social Services, hereby joins, relies upon, and incorporates by reference ECF No. 52, the brief filed by this date by Defendant Henry McMaster. The contentions made therein apply with equal force to this Defendant.

<sup>1</sup> Substituted automatically pursuant to Rule 25(d), F.R.Civ.P., for Joan Meacham, former acting State DSS Director.

Respectfully submitted,

DAVIDSON, WREN & PLYLER P.A.

*s/Kenneth P. Woodington*  
WILLIAM H. DAVIDSON, II, #425  
KENNETH P. WOODINGTON, #4741  
1611 Devonshire Drive, 2nd Floor  
Post Office Box 8568  
Columbia, South Carolina 29202-8568  
[wdauidson@dml-law.com](mailto:wdauidson@dml-law.com)  
[kwoodington@dml-law.com](mailto:kwoodington@dml-law.com)  
T: 803-806-8222  
F: 803-806-8855

*Counsel for Defendant Leach*

Columbia, South Carolina

August 20, 2019