

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

Eden Rogers and Brandy Welch, )  
 )  
 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; 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. )  
 \_\_\_\_\_ )

Civil Action No.  
6:19-cv-01567-TMC

**ANSWERS TO RULE 26.01  
INTERROGATORIES  
(DEFENDANT MICHAEL LEACH)**

Pursuant to Rule 26.01 of the Local Civil Rules of the United States District Court for the District of South Carolina, Defendant Michael Leach, in his official capacity as State Director of the South Carolina Department of Social Services, submits the following answers to interrogatories as required by the Court:

1. State the full name, address and telephone number of all personal or legal entities

who may have a subrogation interest in each claim and state the basis and extent of said interest.

**RESPONSE #1:**

**None.**

2. As to each claim, state whether it should be tried jury or non-jury and why.

**RESPONSE #2:**

**Nonjury. This action seeks only declaratory and injunctive relief.**

3. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent; subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**RESPONSE #3:**

**Not applicable.**

4. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**RESPONSE #4:**

**No challenge is made by these Defendants to the appropriateness of the division.**

5. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number in the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the

cases: arise from the same or identical transactions, happening or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**RESPONSE #5:**

**One civil matter pending before this Court is wholly related to this matter:**

**(1) *Maddonna v. U.S. Dep't of Health & Human Servs.*, No. 6:19-cv-448-TMC (D.S.C.).**

**(2) Plaintiff in *Maddonna*, as in this case, similarly brings claims under the Establishment Clause and the equal protection component of the Fifth Amendment.**

**(3) All defendants have filed motions to dismiss in *Maddonna*, which are fully briefed and pending decision by the Court**

6. If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**RESPONSE #6:**

**Not applicable.**

7. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

**RESPONSE #7:**

**These Defendants are not currently aware of any such party or entity that is not already named to this suit..**

Respectfully submitted,

DAVIDSON, WREN & PLYLER P.A.

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