

**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

**REPLY MEMORANDUM IN SUPPORT
OF
MOTION TO DISMISS
(DEFENDANT MICHAEL LEACH)**

Defendant Michael Leach, in his official capacity as State Director of the South Carolina Department of Social Services, Defendant refers to, relies upon, and incorporates by reference ECF No. 66, Defendant Henry McMaster’s Reply in Support of Motion to Dismiss, filed this date.

This Defendant submits that the grounds set forth in Defendant McMaster’s Reply apply with equal force and effect to this Defendant. If Defendant McMaster’s Motion to Dismiss were to

be granted, it would logically follow that Defendant Leach should be dismissed for the same reasons.

Respectfully submitted,

DAVIDSON, WREN & PLYLER P.A.

s/Kenneth P. Woodington

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October 11, 2019