

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

Aimee Maddonna,)	Civil Action No. 6:19-cv-03551-DCC
)	
)	
Plaintiff,)	
)	LETTER EXTENDING TIME TO
v.)	FILE A RESPONSIVE PLEADING
)	
United States Department of Health and)	
Human Services, et al.,)	
)	
Defendants.)	

Pursuant to Local Civil Rule 12.01, Defendant Henry McMaster, in his official capacity as Governor of South Carolina, has requested and received the written agreement of Plaintiff Aimee Maddonna to extend by 21 days the time in which the Governor may file a responsive pleading to the Complaint. *See* Exhibit A, attached hereto. Prior to the parties' agreement to this extension, Governor McMaster's responsive pleading was due on January 21, 2020. Pursuant to the agreed-upon extension, the new deadline for the Governor's responsive pleading is February 11, 2020.

Respectfully submitted

NELSON MULLINS RILEY & SCARBOROUGH LLP

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Attorneys for Governor Henry McMaster

Greenville, South Carolina
January 15, 2020

Miles Coleman

From: Sarah Goetz <goetz@au.org>
Sent: Wednesday, January 15, 2020 12:27 PM
To: Miles Coleman; Kenneth P. Woodington; Ken Upton; Richard Katskee; scdo claw@yahoo.com
Cc: Maddonna v_ HHS_ Maddonna_ Aimee E_Mail
Subject: RE: Maddonna v. HHS et al. -- request for an agreed-upon extension [IMAN-AULEGALDOCS.FID715]

Counsel,

Yes, we consent to extending the deadline to February 11, 2020, for Defendants McMaster and Leach.

Thanks,
Sarah



Sarah R. Goetz
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Americans United for Separation of Church and State
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From: Miles Coleman <Miles.Coleman@nelsonmullins.com>
Sent: Wednesday, January 15, 2020 11:40 AM
To: Kenneth P. Woodington <kwoodington@DML-LAW.com>; Ken Upton <upton@au.org>; Richard Katskee <katskee@au.org>; Sarah Goetz <goetz@au.org>; scdo claw@yahoo.com
Subject: RE: Maddonna v. HHS et al. -- request for an agreed-upon extension

Counsel — my apologies for a typographical error in my calculation of the “new” deadline in my email below. If the extension were granted, the new deadline would be February 11, 2020 (rather than 2019). My apologies for the error and any resulting confusion.

Miles

From: Kenneth P. Woodington <kwoodington@DML-LAW.com>
Sent: Wednesday, January 15, 2020 10:21 AM
To: Miles Coleman <Miles.Coleman@nelsonmullins.com>; 'Ken Upton' <upton@au.org>; Richard Katskee <katskee@au.org>; Sarah Goetz <goetz@au.org>; scdo claw@yahoo.com
Subject: RE: Maddonna v. HHS et al. -- request for an agreed-upon extension

Counsel, I would make the same request for Leach.

Thanks.

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From: Miles Coleman [<mailto:Miles.Coleman@nelsonmullins.com>]
Sent: Wednesday, January 15, 2020 10:17 AM
To: 'Ken Upton'; Richard Katskee; Sarah Goetz; scdoctlaw@yahoo.com
Cc: Kenneth P. Woodington
Subject: Maddonna v. HHS et al. -- request for an agreed-upon extension

Counsel,

My Firm has been retained to represent Governor McMaster in *Maddonna v. U.S. Dept. of Health & Human Servs. et al.* (civil action no. 6:19-cv-03551-DCC). Pursuant to Local Civil Rule 12.01, would you agree to an extension of 21 days in which the Governor may file a responsive pleading? By my calculation, if this request is granted, the new deadline would be February 11, 2019, which would still be several weeks before the federal defendants' responsive pleadings are due.

I have copied Ken Woodington, who I believe may be representing Mr. Leach in this matter, on this email to apprise him of this request.

Thank you for your consideration.

Miles

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