

**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; et al. )  
 Defendants. )  
 \_\_\_\_\_ )

Civil Action No.  
6:19-cv-03551-DCC

**MOTION TO DISMISS  
(Defendant Michael Leach)**

Defendant Michael Leach, in his official capacity as State Director of the South Carolina Department of Social Services, moves this Court, pursuant to Rules 12(b)(1) and (6) of the Federal Rules of Civil Procedure for an Order dismissing, with prejudice, the claims asserted against him in this action. In further support of this Motion, this Defendant refers to, relies upon, and incorporates by reference ECF No. 19, the Motion to Dismiss filed by Defendant Henry McMaster, and its attachments.

This Defendant submits that if Defendant McMaster’s Motion to Dismiss were to be granted, it would logically follow that Defendant Leach, as the head of a department within Governor McMaster’s cabinet, should be dismissed for the same reasons.

*[Signature block is on following page]*

Respectfully submitted,

DAVIDSON, WREN & DEMASTERS, P.A.

*s/Kenneth P. Woodington*

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