

**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

**LOCAL RULE 26.10 RESPONSES OF
DEFENDANT LEACH**

Defendant Michael Leach, in his official capacity as State Director of the South Carolina Department of Social Services, pursuant to Rule 26.01 of the Local Civil Rules of the United States District Court for the District of South Carolina, 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:

No party to this case has requested a jury trial on any of the claims at this time.

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 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 this Defendant 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:

(1) Plaintiff Aimee Maddonna previously filed suit in this Court raising nearly identical claims against nearly identical Defendants arising from the same transactions and occurrences and asserting causes of action and requests for relief that are nearly identical to those in this suit. *See Maddonna v. U.S. Dept. of Health and Human Servs. et al.*, Case No. 6:19-cv-00448-TMC

(D.S.C.). The case was dismissed without prejudice on November 13, 2019 due to Plaintiff's failure to establish standing.

(2) A different set of plaintiffs filed suit in this Court raising nearly identical claims against nearly identical Defendants arising from the same transactions and occurrences and asserting causes of action and requests for relief that are nearly the same as those in this suit. *See Rogers v. U.S. Dept. of Health and Human Servs.*, Case No. 6:19-cv-01567-DCC (D.S.C.). Briefing has been completed on the Defendants' Motions to Dismiss in that suit.

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:

Not applicable.

Respectfully submitted,

DAVIDSON, WREN & DEMASTERS, P.A.

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