

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

Aimee Maddonna,)	CA: 6:19-cv-03551-TMC
)	
Plaintiff,)	
)	RULE 26(f) REPORT
v.)	
)	
United States Department of Health)	
and Human Services, <i>et al.</i> ,)	
)	
Defendant(s).)	

The parties, having consulted pursuant to Rule 26(f), Fed. R. Civ. P., hereby report as follows (check one below):

- We agree that the schedule set forth in the Conference and Scheduling Order filed is appropriate for this case. **The parties’ proposed discovery plan as required by Fed. R. Civ. P. Rule 26(f) and the information required by Local Civil Rule 26.03 will be separately filed by the parties.**
- We agree that the schedule set forth in the Conference and Scheduling Order filed requires modification as set forth in the proposed Consent Amended Scheduling Order which will be e-mailed to chambers as required (use format of the Court’s standard scheduling order). **The parties’ proposed discovery plan as required by Fed. R. Civ. P. Rule 26(f) and the information required by Local Civil Rule 26.03 will be separately filed by the parties.**
- We are unable, after consultation, to agree on a schedule for this case. We, therefore, request a scheduling conference with the Court. **The parties’ proposed discovery plan as required by 26(f) Fed. R. Civ. P., with disagreements noted, and the information required by Local Civil Rule 26.03 will be separately filed by the parties.**

(SIGNATURE PAGES ATTACHED)

CAPITOL COUNSEL, LLC

s/ Aaron J. Kozloski

AARON J. KOZLOSKI
(D.S.C. Bar No. 9510)
P.O. Box 1996
Lexington, SC 29071-1996
Tel: (803) 465-1400
Fax: (888) 513-6021
Email: aaron@capitolcounsel.us

AMERICANS UNITED FOR
SEPARATION OF CHURCH AND STATE

RICHARD B. KATSKEE*
KENNETH D. UPTON, JR.*
SARAH R. GOETZ*
1310 L Street NW, Suite 200
Washington, DC 20005
Tel: (202) 466-3234
Fax: (202) 466-3353
E-Mail: katskee@au.org
upton@au.org
goetz@au.org
*Admitted *pro hac vice*

Counsel for Plaintiff

JEFFREY BOSSERT CLARK
Acting Assistant Attorney General

PETER M. MCCOY
United States Attorney
/s/ Christie V. Newman
CHRISTIE V. NEWMAN (#5473)
Assistant United States Attorney
1441 Main Street, Suite 500
Columbia, SC 29201
Telephone: (803) 929-3021
Email: Christie.Newman@usdoj.gov

MICHELLE BENNETT
Assistant Branch Director

CHRISTOPHER A. BATES
Senior Counsel to the Assistant Attorney
General

JAMES R. POWERS
(TX Bar No. 24092989)*
Trial Attorney
Federal Programs Branch
U.S. DEPARTMENT OF JUSTICE, CIVIL
DIVISION
1100 L Street, NW
Washington, DC 20005
Telephone: (202) 353-0543
Email: james.r.powers@usdoj.gov
*Admitted *pro hac vice*

Counsel for Federal Defendants

NELSON MULLINS RILEY &
SCARBOROUGH LLP

By: s/ Miles E. Coleman

MILES E. COLEMAN

Federal Bar No. 11594

E-Mail:

miles.coleman@nelsonmullins.com

2 W. Washington St. / 4th Floor

Greenville, SC 29201

(864) 373-2352

JAY T. THOMPSON

Federal Bar No. 09846

E-Mail:

jay.thompson@nelsonmullins.com

1320 Main Street / 17th Floor

Post Office Box 11070 (29211-1070)

Columbia, SC 29201

(803) 799-2000

OFFICE OF THE ATTORNEY GENERAL

ROBERT D. COOK

South Carolina Solicitor General

Federal Bar No. 285

E-Mail: bcook@scag.gov

Post Office Box 11549

Columbia, SC 29211

(803) 734-3970

Attorneys for Governor Henry McMaster

DAVIDSON, WREN & DEMASTERS, P.A.

By: s/Kenneth P. Woodington

WILLIAM H. DAVIDSON, II, #425

KENNETH P. WOODINGTON, #4741

1611 Devonshire Drive, 2nd Floor

Post Office Box 8568

Columbia, South Carolina 29202-8568

E-Mail:

wdavidson@dml-law.com

kwoodington@dml-law.com

T: 803-806-8222

F: 803-806-8855

*Counsel for Defendant Michael Leach, in
his official capacity as State Director of the
South Carolina Department of Social
Services*

Date: September 28, 2020

Location: Greenville, SC