

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

EDEN ROGERS and

BRANDY WELCH,

Plaintiffs,

-against-

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;

SCOTT LEKAN, 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.

Case No. 6:19-cv-01567-JD

**CONSENT MOTION FOR
EXTENSION OF TIME FOR
PLAINTIFFS TO RESPOND
TO DEFENDANTS HENRY
MCMASTER'S AND
MICHAEL LEACH'S MOTION
FOR JUDGMENT ON THE
PLEADINGS AND MOTION
TO STAY DISCOVERY**

Plaintiffs Eden Rogers and Brandy Welch hereby move for a 14-day extension of the deadline to file their responses to the Motion for Judgment on the Pleadings (ECF No. 173) and Motion to Stay Discovery and Hold Pending Discovery Motions in Abeyance (ECF No. 174) (the “Motions”) filed by Defendants Henry McMaster and Michael Leach (collectively, “State Defendants”).

State Defendants filed their Motions on July 15, 2021. Under Local Civil Rule 7.06, the current deadline for Plaintiffs to file their responses is July 29, 2021. This deadline has not previously been extended. If the requested 14-day extension is granted, the new deadline for Plaintiffs to file their responses would be August 12, 2021.

The requested extension is necessary to allow Plaintiffs sufficient time to respond to both of State Defendants’ Motions and to accommodate counsel’s other litigation deadlines. The requested extension would not alter any other deadlines, and State Defendants have consented to this request.

For the foregoing reasons, Plaintiffs respectfully request that their time to respond to State Defendants’ Motions be extended until August 12, 2021.

July 22, 2021

Respectfully submitted,

s/ Nekki Shutt

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