

**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.

Case No. 6:19-cv-03551-JD

**JOINT MOTION TO EXTEND
REMAINING DISCOVERY
DEADLINES**

Pursuant to Rule 29(b) of the Federal Rules of Civil Procedure and Local Civil Rule 6.01, Plaintiff Aimee Maddonna and State Defendants Michael Leach, in his official capacity as State Director of the South Carolina Department of Social Services, and Henry McMaster, in his official capacity as Governor of the State of South Carolina, move the Court to extend the remaining discovery deadlines in this matter.¹ In support of this motion, the parties state as follows:

1. The current deadlines are set out in the Fourth Amended Scheduling Order (ECF 78).
2. The original discovery deadlines have been extended four times, each time by consent of all parties (*see* ECF 57, 63, 72, 76).
3. Prior to the deadlines affected by this motion, the State Defendants filed a consent motion (ECF 80) to stay the remaining discovery deadlines until the Court had an opportunity to rule on their then-pending Motion for Judgment on the Pleadings. This

¹ Defendants U.S. Department of Health and Human Services, Xavier Becerra, in his official capacity as Secretary of HHS, Administration for Children and Families, and JooYeun Chang, in her official capacity as Acting Assistant Secretary of ACF (“Federal Defendants”) consent to the motion and requested extensions on the condition that Plaintiff not pursue additional discovery against them. The Federal Defendants have already produced the administrative record and Plaintiff does not intend to pursue any additional discovery of them.

motion supplements and supersedes the relief requested in the prior pending motion by proposing new deadlines to conclude discovery.

4. Plaintiff and State Defendants have worked cooperatively to streamline the remaining discovery needed. In light of those discussions, the parties request that the Court extend the remaining deadlines (paragraphs 4 through 10 of the Fourth Amended Scheduling Order) to complete discovery and conduct mediation.
5. A proposed Fifth Amended Scheduling Order reflecting the requested extensions is submitted directly to chambers by email (dawson_ecf@scd.uscourts.gov) with copy to opposing counsel.

For the foregoing reasons, the parties respectfully request that the Court modify the scheduling order governing this case as requested herein.

Respectfully submitted this 6th day of January 2022.

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