

**UNITED STATES DISTRICT
COURT SOUTHERN DISTRICT OF
FLORIDAMIAMI DIVISION
Case No.: 1:21-CV-22441-SCOLA, JR./GOODMAN**

DONALD J. TRUMP, the Forty- Fifth
President of the United States, LINDA
CUADROS, AMERICAN CONSERVATIVE
UNION, RAFAEL BARBOZA, DOMINICK
LATELLA, WAYNE ALLYN ROOT, NAOMI
WOLF, INDIVIDUALLY AND ON BEHALF
OF A CLASS OF PERSONS SIMILARLY
SITUATED,

Plaintiff and the Class,

vs.

TWITTER, INC., and JACK DORSEY,

Defendants.

PLAINTIFF’S MOTION TO EXCEED PAGE LIMITATIONS

Plaintiff, Donald J. Trump (“Plaintiff”), hereby moves for an Order permitting Plaintiff to file a Motion for a Preliminary Injunction and Memorandum in Support (“Motion”) that exceeds the page limitation set by Local Rule 7.1(c).

M E M O R A N D U M O F P O I N T S A N D A U T H O R I T I E S

In support of this Motion to exceed the twenty-page limitation set by Local Rule 7.1(c), Plaintiff states as follows: Local Rule 7.1(c) prohibits him from filing motions and incorporated memoranda of law that exceeds twenty pages without prior permission of the Court. In connection with his four-count Complaint, Plaintiff will be moving for a Preliminary Injunction against the above-named Defendants who operate a massive social media company that violates the First Amendment and is designed to use unfair trade practices based on Defendants' misleading

representations that treats consumers differently, using differing standards to censor them. These deceptive representations have likely injured hundreds of thousands of consumers across the country. The Defendant's ongoing practices violate the First Amendment to the U.S. Constitution, and the Florida Deceptive and Unfair Trade Practices Act, Fla. Stat. 501.201 et seq., which prohibits deceptive and unfair practices in or affecting commerce. In light of the number of parties involved, and the voluminous evidence illustrating Defendant's illegal activity, Plaintiff requires more than twenty pages to set forth adequately the legal and factual basis for the requested relief, and to demonstrate that this case requires a Preliminary Injunction enjoining Defendants, allowing Plaintiff to demonstrate that he has satisfied the burden of proof necessary.

In addition to an ordinary case where twenty pages is more than adequate for the evaluation of a Motion for Preliminary Injunction, this case requires:

(1) the showing of multiple facts within the Memorandum of Law that prove Plaintiff's claims, well beyond those within the accompanying Declarations;

(2) the existence of multiple constitutional issues that have not been litigated in any court in the Southern District of Florida; and

(3) the existence of several factual and legal issues that have not been litigated under the new Florida social media statute, SB7072, which went into effect on July 1, 2021, both under the Florida Unfair and Deceptive Trade Practices Act and the United States Constitution.

WHEREFORE, for the reasons stated above, the Plaintiff respectfully request that the Court grant the accompanying Proposed Order allowing the Plaintiff to file his Motion in excess of twenty pages.

Respectfully submitted by,

/s/ Matthew Lee Baldwin, Esq
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CERTIFICATE OF CONFERRAL

Pursuant to S.D. Fla. L.R. 7.1, the Motion for a Preliminary Injunction does not require a pre-filing conferral. Accordingly, Plaintiff requests leave from this Honorable Court to file said motion in excess of the local rule page limit. Defendants will be served with the Motion for Preliminary Injunction immediately after it is filed.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Exceed Page Limitations was served by CM/ECF filing system on August 13, 2021, on all counsel or parties of record on the service list.

Respectfully submitted by,

/s/ Matthew Lee Baldwin, Esq
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