

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

<p>TIMOTHY KING, MARIAN ELLEN SHERIDAN, JOHN EARL HAGGARD, CHARLES JAMES RITCHARD, JAMES DAVID HOOPER and DAREN WADE RUBINGH,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>GRETCHEN WHITMER, in her official capacity as Governor of the State of Michigan, et al,</p> <p style="text-align: center;">Defendants,</p> <p style="text-align: center;">and</p> <p>CITY OF DETROIT, et al,</p> <p style="text-align: center;">Intervenor-Defendants.</p>	<p>No. 2:20-cv-13134</p> <p>Hon. Linda V. Parker</p>
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**INTERVENOR-DEFENDANT CITY OF DETROIT’S EX PARTE MOTION
TO EXTEND PAGE LIMIT**

Intervenor-Defendant City of Detroit (the “City”), by and through counsel, respectfully requests leave to file its Reply to Plaintiffs’ Response in Opposition to the City of Detroit’s Motion to Dismiss and for an Award of Sanctions in excess of the page limit. In support of this request, the City states:

1. Plaintiffs filed a 25-page Response to the City’s Motion to Dismiss and for an Award of Sanctions, focusing almost exclusively on the request for sanctions (ECF No. 85).

2. Pursuant to Local Rule 7.1(d)(3), a reply brief may not exceed 7 pages. However, the Rule permits parties to apply *ex parte* to file a longer brief. Moreover, this Court has encouraged parties to request a page limit extension “[w]hen page limits are inadequate for a party’s needs” *Elhady v Bradley*, 438 F. Supp. 3d 797, 821 n. 11 (E.D. Mich. 2020).

3. The City requests leave to file a reply brief not to exceed 10 pages, in order to address the full scope of legal and factual issues raised by, and incorporated into, Plaintiffs’ Response.

4. The City has attempted to limit the length of the brief without sacrificing clarity and/or its ability to address the factual and legal issues supporting its reply. However, due to the number of factual and legal issues needing to be addressed, the City, through counsel, has been unable to limit the brief to 7 pages.

WHEREFORE, the City respectfully requests that this Court permit it to file a reply brief not to exceed 10 pages in support of its Motion to Dismiss and for an Award of Sanctions.

Respectfully submitted,

FINK BRESSACK

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CERTIFICATE OF SERVICE

I hereby certify that on February 4, 2021, I electronically filed the foregoing paper with the Clerk of the court using the electronic filing system, which sends notice to all counsel of record.

FINK BRESSACK

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