

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

BROCK STONE, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

Case No. 1:17-cv-02459-MJG

Hon. Marvin J. Garbis

**PLAINTIFFS' CONSENT MOTION TO EXCEED PAGE
LIMIT FOR PLAINTIFFS' REPLY MEMORANDUM IN
SUPPORT OF CROSS-MOTION FOR SUMMARY JUDGMENT**

Plaintiffs respectfully file this Consent Motion to Exceed Page Limit for Plaintiffs' Reply Memorandum in Support of Cross-Motion for Summary Judgment, and in support thereof state the following:

1. Plaintiffs filed their Second Amended Complaint on April 27, 2018. ECF 148.
2. On May 11, Defendants filed a Motion to Dismiss the Second Amended Complaint, or in the Alternative, a Motion for Summary Judgment. ECF 158. Plaintiffs filed an Opposition to Defendants' Motion to Dismiss or for Summary Judgment, and cross-moved for summary judgment on May 25. ECF 163. By order, the Court permitted Plaintiffs and Defendants each to submit a brief of up to fifty (50) pages in support of these respective filings, instead of the limit of thirty-five (35) pages set by Local Rule 105.3. ECF 157.
3. Defendants filed an Opposition to Plaintiffs' Cross-Motion for Summary Judgment and Reply in Support of Defendants' Motion to Dismiss or, in the Alternative, for Summary Judgment on June 15. ECF 176. By order, the Court permitted Defendants to submit a brief of up to fifty (50) pages in support of this opposition and reply. ECF 175.

4. The legal arguments relevant to Plaintiffs' cross-motion for summary judgment are numerous, varied, and complex. *Inter alia*, Plaintiffs must address both jurisdictional arguments raised by Defendants and Defendants' opposition to the merits of Plaintiffs' arguments in favor of summary judgment. In order to adequately address Defendants' allegations and arguments, Plaintiffs require more than the twenty (20) pages permitted for a reply brief under Local Rule 105.3.

5. Accordingly, Plaintiffs respectfully request an enlargement of the page limit to twenty-six (26) pages for their forthcoming reply memorandum in support of their Cross-Motion for Summary Judgment, due on July 6, 2018.

6. Plaintiffs have conferred with Defendants' counsel regarding this Motion, and Defendants consent to Plaintiffs' Motion.

WHEREFORE, for the reasons set forth above, Plaintiffs have demonstrated good cause for an expansion of the page limit and move this Court to permit Plaintiffs to submit a reply memorandum of up to twenty-six (26) pages in support of their Cross-Motion for Summary Judgment. A proposed order is attached to this motion.

Dated: July 3, 2018

David M. Zionts*
Carolyn F. Corwin*
Mark H. Lynch (Bar No. 12560)
Augustus Golden*
Jeff Bozman*
Marianne F. Kies (Bar No. 18606)
Joshua D. Roselman*
Peter J. Komorowski (Bar No. 20034)
Mark Neuman-Lee*
COVINGTON & BURLING LLP
One CityCenter
850 Tenth St. NW
Washington, DC 20001
Telephone: (202) 662-6000
Facsimile: (202) 778-5987
dzionts@cov.com
ccorwin@cov.com
mlynch@cov.com
agolden@cov.com
jbozman@cov.com
mkies@cov.com
jroselman@cov.com
pkomorowski@cov.com
mneumanlee@cov.com

Mitchell A. Kamin*
Nicholas A. Lampros*
COVINGTON & BURLING LLP
1999 Avenue of the Stars, Suite 3500
Los Angeles, California 90067
Telephone: (424) 332-4800
Facsimile: (424) 332-4749
mkamin@cov.com
nlampros@cov.com

Sara D. Sunderland*
COVINGTON & BURLING LLP
One Front Street
San Francisco, California 94111
Telephone: (415) 591-7004
Facsimile: (415) 591-6091
ssunderland@cov.com

* *Admitted pro hac vice*

Respectfully submitted,

/s/ Peter J. Komorowski

Deborah A. Jeon (Bar No. 06905)
David Rocah (Bar No. 27315)
AMERICAN CIVIL LIBERTIES UNION FOUNDATION
OF MARYLAND
3600 Clipper Mill Road, #350
Baltimore, MD 21211
Telephone: (410) 889-8555
Fax: (410) 366-7838
jeon@aclu-md.org
rocah@aclu-md.org

Joshua A. Block*
Chase B. Strangio*
James Esseks*
Leslie Cooper*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street, 18th Floor
New York, NY 10004
Telephone: 212-549-2627
Fax: 212-549-2650
jblock@aclu.org
cstrangio@aclu.org
jesseks@aclu.org
lcooper@aclu.org

Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

BROCK STONE, et al.,
Plaintiffs,

vs.

DONALD J. TRUMP, et al.,
Defendants.

Case No. 1:17-cv-02459-MJG

[PROPOSED] ORDER

Upon consideration of Plaintiffs' Consent Motion to Exceed the Page Limit, and because good cause has been shown, it is hereby ordered that Plaintiffs may submit a reply brief of up to twenty-six (26) pages in support of Plaintiffs' Cross-Motion for Summary Judgment.

DATED:

U.S. District Court, District of Maryland