

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

ROBERT L. VAZZO, LMFT, individually)
and on behalf of his patients,)
DAVID H. PICKUP, LMFT, individually)
and on behalf of his patients, and) Case No. 8:17-cv-2896-T-02AAS
SOLI DEO GLORIA INTERNATIONAL,)
INC. d/b/a NEW HEARTS OUTREACH)
TAMPA BAY, individually and on behalf of)
its members, constituents and clients,)
)
Plaintiffs,)
)
v.)
)
CITY OF TAMPA, FLORIDA,)
)
Defendant.)
)

**PLAINTIFFS' MOTION TO EXCEED PAGE LIMIT
FOR POST-HEARING MEMORANDUM OF LAW
IN SUPPORT OF PRELIMINARY INJUNCTION**

Plaintiffs respectfully move the Court for leave to exceed the page limit for their Post-Hearing Memorandum of Law in Support of Preliminary Injunction. In support, Plaintiffs show the Court as follows:

1. At the conclusion of the hearing on Plaintiffs' Motion for Preliminary Injunction, the Court ordered the parties and *amicus curiae* to file post-hearing memoranda not to exceed ten pages each. (DE 136.)

2. Plaintiffs have endeavored diligently to distill the record materials and their important rebuttal points into a filing that complies with the page limit but have been unable to do so. Plaintiffs' proposed submission, filed herewith, contains just over seventeen pages of substantive content, and Plaintiffs respectfully request the Court's leave to file it.

3. Granting Plaintiffs leave to exceed the page limit is commensurate with the nature of this case, which involves numerous and weighty constitutional and statutory issues. Moreover, granting Plaintiffs leave is commensurate with the combined twenty pages available to Defendant City of Tampa and its supporting *amicus curiae*, Equality Florida.

4. Furthermore, and most importantly, granting Plaintiffs leave to exceed the page limit will assist the Court in reviewing, distilling, and adjudicating the important record facts and legal issues developed in this case. Plaintiffs' proposed submission is organized into concise points and authorities to maximize its usefulness to the Court.

5. Plaintiffs are mindful of the Court's time and do not submit this motion for purposes of undue delay.

WHEREFORE, for good cause shown, Plaintiffs respectfully request that this motion be granted, and that the Court permit them to exceed the page limit for their Post-Hearing Memorandum of Law in Support of Preliminary Injunction. Plaintiffs conditionally file their submission herewith while awaiting the Court's decision.

Respectfully submitted,

/s/ Roger K. Gannam
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CERTIFICATE OF SERVICE

I hereby certify that on this December 3, 2018, I caused a true and correct copy of the foregoing to be filed electronically with the Court's CM/ECF system. Service upon all counsel of record will be effectuated by the Court's electronic notification system.

/s/ Roger K. Gannam
Roger K. Gannam
Attorney for Plaintiffs