

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

**Bear Creek Bible Church, et al.,**

Plaintiffs,

v.

**Equal Employment Opportunity  
Commission, et al.,**

Defendants.

Case No. 4:18-cv-00824-O

**UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMITS  
FOR REPLY BRIEF IN SUPPORT OF PLAINTIFFS' MOTION  
FOR CLASS CERTIFICATION**

The plaintiffs respectfully seek leave to exceed the page limits for reply briefs set forth in Local Rule 7.2(c), nunc pro tunc. The plaintiffs filed their 12-page reply brief in support of their motion for class certification on June 23, 2021. The plaintiffs tried and had hoped to keep their reply brief within the 10-page limit set forth in Local 7.2(c) but were unable to do given the many points and authorities raised in the defendants' response. The defendants raised seven separate and independent arguments against class certification, and the plaintiffs were unable to fully address and rebut those points in 10 pages.

The plaintiffs therefore respectfully request nunc pro tunc approval to file a reply brief of up to 12 pages, which exceeds the page limits set forth in Local 7.2(c) by two pages. We have conferred with counsel for the defendants and they are unopposed to this motion.

**CONCLUSION**

The motion to exceed page limits should be granted.

Respectfully submitted.

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Dated: June 24, 2021

*Counsel for Plaintiffs and  
the Proposed Classes*

### CERTIFICATE OF CONFERENCE

I certify that on June 24, 2021, I conferred with Benjamin T. Takemoto, counsel for the defendants, and she informed me that the defendants are unopposed to this motion.

/s/ Jonathan F. Mitchell  
JONATHAN F. MITCHELL  
*Counsel for Plaintiffs and  
the Proposed Classes*

### CERTIFICATE OF SERVICE

I certify that on June 24, 2021, I served this document through CM/ECF upon:

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**[PROPOSED] ORDER GRANTING PLAINTIFFS' UNOPPOSED  
MOTION FOR LEAVE TO EXCEED PAGE LIMITS FOR REPLY  
BRIEF IN SUPPORT OF MOTION FOR CLASS CERTIFICATION**

The plaintiffs' motion to exceed the page limits for reply briefs set forth in Local Rule 7.2(c) is granted. The plaintiffs may file a reply brief of up to 12 pages in support of their motion for class certification. The reply brief in support of the plaintiffs' motion for class certification that was filed on June 23, 2021, is deemed to be properly filed, nunc pro tunc.

Dated: \_\_\_\_\_, 2021

\_\_\_\_\_  
REED O'CONNOR  
UNITED STATES DISTRICT JUDGE