

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>GERALD LYNN BOSTOCK,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>CIVIL ACTION</b>
	)	<b>NO: 1:16-cv-01460-ELR-WEJ</b>
<b>CLAYTON COUNTY,</b>	)	
	)	
<b>Defendant.</b>	)	

**DEFENDANT’S REQUEST FOR EXTENSION OF LIMITS FOR  
PARAGRAPHS IN STATEMENT OF MATERIAL FACTS**

COMES NOW Clayton County (“the County”), the Defendant in the above-referenced case, and files this, its Request for Extension of Limits for Paragraphs in Statement of Material Facts.

On October 26, 2020, the Court issued an Order limiting statements of material facts as to which there exists no genuine issue to be tried to one sentence per paragraph and 50 paragraphs, except by leave of Court. (Doc. 46, at p. 1).

The County hereby requests leave to file a statement of material facts that includes up to 75 paragraphs. The County respectfully submits that a minimum of 75 paragraphs is needed to present all the material facts necessary to demonstrate that there are no genuine issues to be tried in this case. The record in this case is

substantial. Thousands of pages of documents were exchanged by the parties during discovery, and eight depositions were taken. Because of this substantial record, a minimum of 75 paragraphs is necessary to demonstrate the absence of any triable issues of fact, especially in light of the fact that each paragraph must be limited to one sentence.

According, the County respectfully requests that the Court issue an Order granting the County leave to file a statement of material facts that is up to 75 paragraphs in length. A proposed Order is attached.

Respectfully submitted,

**FREEMAN MATHIS & GARY, LLP**

*/s/ Jack R. Hancock*

Jack R. Hancock

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**CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1(D), I hereby certify that the within and foregoing **DEFENDANT’S REQUEST FOR EXTENSION OF LIMITS FOR PARAGRAPHS IN STATEMENT OF MATERIAL FACTS** has been prepared in compliance with Local Rule 5.1(B) in 14-point Times New Roman type face.

This 17<sup>th</sup> day of March, 2022.

*/s/ Jack R. Hancock*

\_\_\_\_\_  
Jack R. Hancock

Georgia Bar No. 322450

**CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the within and foregoing **DEFENDANT’S REQUEST FOR EXTENSION OF LIMITS FOR PARAGRAPHS IN STATEMENT OF MATERIAL FACTS** with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following counsel of record:

Thomas J. Mew, IV  
Edward D. Buckley  
Andrew Beal  
Buckley Beal LLP  
600 Peachtree Street, NE, Suite 3900  
Atlanta, GA 30308

This 17th day of March, 2022.

*/s/ Jack R. Hancock* \_\_\_\_\_

Jack R. Hancock  
Georgia Bar No. 322450

**IN THE UNITED STATES DISTRICT COURT  
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ATLANTA DIVISION**

**GERALD LYNN BOSTOCK,** )

**Plaintiff,** )

**v.** )

**CLAYTON COUNTY,** )

**Defendant.** )

**CIVIL ACTION  
NO: 1:16-cv-01460-ELR-WEJ**

**ORDER**

For good cause shown, Defendant’s Request for Extension of Limits for Paragraphs in Statement of Material Facts is **GRANTED**. Defendant may file a statement of material facts as to which there is no genuine issued to be tried that includes up to 75 paragraphs.

**SO ORDERED**, this \_\_\_\_ day of March, 2022.

\_\_\_\_\_  
WALTER E. JOHNSON  
UNITED STATES MAGISTRATE JUDGE