

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

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

**PLAINTIFF’S CONSENT MOTION FOR EXTENSION OF LIMITS FOR
PARAGRAPHS IN STATEMENTS OF MATERIAL FACTS**

Plaintiff Gerald Bostock, with Defendant’s consent, respectfully moves for an extension of the limit of the number of paragraphs in his summary judgment filing and in his response as set forth below.

On October 26, 2020, the Court entered an order specifying certain guidelines in anticipation of the filing of summary judgment motions. (Doc. 46). In that order, the Court limited the number of paragraphs in any statement of material facts filed pursuant to Local Rule 56.1B to no more than 50 numbered facts. *Id.* at 1. Plaintiff requests an extension of this limit to 75 numbered, single sentence statements of fact in Plaintiff’s brief in support of its to be filed motion for summary judgment and an extension of this limit to 75 numbered, single sentence statements of fact in any statement of additional facts Plaintiff may file as part of

Plaintiff's brief in opposition to any motion for summary judgment that Defendant may file.

As stated in Defendant's similar motion (Doc. 123), the record in this case is substantial and includes thousands of pages of documents and eight depositions. Plaintiff intends to file a motion for summary judgment and anticipates Plaintiff may require at least 75 paragraphs in order to present all the material facts and meet his burden to show the absence of triable issue. This extension is necessary due to the voluminous record and the limitation of each paragraph to one sentence.

Plaintiff's counsel has corresponded with Defendant's counsel, and Defendant has consented to this motion. Plaintiff further states that Plaintiff consents to Defendant's similar motion which requests a similar extension of this limit, (Doc. 123), and also consents to Defendant having an extension to 75 numbered, single sentence statements of fact in any statement of additional facts Defendant may file as part of its brief in opposition to any motion for summary judgment that Plaintiff may file.

WHEREFORE, Plaintiff respectfully requests that this Court grant this Motion and that the limitation on paragraphs to be filed along with Plaintiff's motion for summary judgment be extended up to 75 paragraphs and that the same extension to 75 paragraphs be granted for any statement of additional facts Plaintiff

may file as part of Plaintiff's brief in opposition to any motion for summary judgment that Defendant may file. A proposed order is attached.

Respectfully submitted this 17th day of March, 2022.

/s/ Thomas J. Mew, IV

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CERTIFICATE OF COMPLIANCE

The undersigned certifies that the foregoing has been prepared in Times New Roman 14 font, as approved by the Court in LR 5.1B.

/s/ Thomas J. Mew
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CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2022, I electronically the foregoing with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all counsel of record.

BUCKLEY BEAL, LLP

By: /s/ Thomas J. Mew
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ORDER

Having read and considered Plaintiff’s Motion for Extension of Limits for Paragraphs in Statement of Material Facts, and good cause having been shown, the motion is GRANTED. Plaintiff shall be allowed to file up to 75 paragraphs in the Statement of Material Facts that will accompany his motion for summary judgment pursuant to Local Rule 56.1B.

SO ORDERED this _____ day of _____, 2022.

HON. WALTER E. JOHNSON
UNITED STATES MAGISTRATE JUDGE