

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

Case No.: 9:18-cv-80771-RLR

ROBERT W. OTTO, PH.D., LMFT,
individually ,and on behalf of his patients,
JULIE H. HAMILTON, PH.D., LMFT,
individually and on behalf of her patients,

Plaintiffs,

v.

CITY OF BOCA RATON, FLORIDA, and
COUNTY OF PALM BEACH, FLORIDA,

Defendants.

**DEFENDANT, PALM BEACH COUNTY'S MOTION TO
EXCEED PAGE LIMITATION BY FIFTEEN PAGES**

The Defendant, PALM BEACH COUNTY (herein referred to as “the County”), by and through undersigned counsel, files this motion to exceed the page limit set forth in Local Rule 7.1(c)(2) by ten (10) pages and as grounds would state:

1. The County intends on filing a response to Plaintiffs’ Motion for Attorney Fees and Non Taxable Expenses (D.E. 221) by June 26, 2023.

2. Under S.D. Fla. Local R. 7.1(c)(2), an opposing memorandum of law shall not exceed twenty (20) pages.

3. Given that Plaintiff’s Motion for Fees is **15 pages** long, the corresponding Declaration of Verification, (Exhibit 1) is **12 pages** long, and the corresponding Plaintiff’s Time Report, (Exhibit 2) is **85 pages** long, the County requires 10 additional pages beyond the 20 normally allowed for a Response. The Plaintiffs’ voluminous billing records and pleadings contain over a dozen different categories of billing activities that are non-compensable, and the County

seeks an extension of the page limit in order to be able to provide the legal basis for its objections to each of these activities.

4. The additional pages are not excessive, and motions to exceed page limits are typically viewed with “liberality” and are “easily and frequently obtained.” Rosenbaum v. Becker & Poliakoff, P.A., 2010 WL 623699, at *3 (S.D. Fla. 2010).

5. Plaintiffs’ counsel has been consulted and objects to the page limit being increased to 30 pages.

WHEREFORE, the County requests that the Court grant this motion and allow it to file a Response in Opposition to the Plaintiff’s Motion for Attorney’s Fees and Non-Taxable Expenses up to 30 pages in length.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail on June 15, 2023 on all counsel of record on the attached Service List.

/s/ Marianna Sarkisyan
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