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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
13

14 UNITED STATES OF AMERICA,)
15 Plaintiff,)
16 v.)
17 WALTER LIEW and CHRISTINA LIEW,)
18 Defendants.)
19

No. CR 11-0573 JSW

**UNITED STATES' MOTION FOR
LEAVE TO FILE OPPOSITION TO
MOTION TO SUPPRESS IN EXCESS
OF TWENTY-FIVE PAGE LIMIT AND
[PROPOSED] ORDER**

20 The government respectfully requests leave to file a brief in opposition to defendant'
21 motion to suppress slightly in excess of the 25-page limit set forth in Criminal L.R. 47-2(b),
22 incorporating by reference Civil L.R. 7-4. The brief is due on July 15, 2013, pursuant to the
23 parties stipulation and the Court's order.

24 The government's memorandum in opposition to Defendants' Motion to Suppress will be
25 less than 30 pages if the Court grants this order. In their motion, defendants raise the following
26 issues: probable cause, particularity, overbreadth, good faith, and severance of parts of the search
27 warrant. In response, the government is required to engage in an extensive legal and factual
28 analysis with regard to each one of these arguments. The Affidavit is 50 pages long and the

1 Warrant identified 13 items for which to search. In addition to the brief, the government will be
2 filing an affidavit by Special Agent Ho regarding the conduct of the search. The analysis of the
3 surfeit of relevant Fourth Amendment case law is factually intensive.

4 A brief slightly in excess of the generally-prescribed page limits is necessary to adequately
5 address the legal and factual issues presented by defendants' motion. Government counsel
6 attempted to address adequately all of the arguments raised by defendants within the 25-page
7 limit, but finds it impossible given the breadth of the issue. Accordingly, the government
8 respectfully requests leave to file a brief in excess of twenty-five pages.

9 DATED: July 15, 2013

Respectfully submitted,

10 MELINDA HAAG
11 United States Attorney

12 /s/
13 _____
14 JOHN H. HEMANN
15 PETER B. AXELROD
16 Assistant United States Attorneys

17 **[PROPOSED] ORDER**

18 For good cause shown, the United States is hereby granted leave to file a brief in
19 opposition to the Liew Motion to Suppress in excess of twenty-five pages.

20 DATED: _____

21 _____
22 JEFFREY S. WHITE
23 United States District Judge
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