## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

BING WU, FENG CHUN GUAN, TINA WANG,
GUI BIN CAI, JUN ZHANG, QIN PING YUAN,

JIN LU MA, ZHEN HAI HE, and BAO WEN TAN, :

Plaintiffs, : CIVIL ACTION NO. 3:08-cv-746

-against-

CHANG'S GARDEN OF STORRS, LLC, CHANG'S GARDEN OF CT, INC., : FEI

LE SHIH CHANG,

HSIANG I CHANG, and WEI-WEI CHANG,

Defendants.

FEBRUARY 8, 2010

## PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE OF COURT TO FILE OVERLENGTH BRIEF

Plaintiffs, by and through their undersigned counsel, hereby respectfully request a twelve (12) page extension for their Memorandum in Opposition to Defendants' Motion for Summary Judgment. Plaintiffs' brief is fifty-two (52) pages. This exceeds the limit of forty (40) pages established by Loc. R. Civ. P. 7(a)(2). Opposing counsel has consented to this Motion.

In their Memorandum, Plaintiffs set forth why (1) as a matter of law, Hsiang I Chang and Wei Wei Chang were employers for the purposes of the Fair Labor Standards Act and the Connecticut wage and hour laws; (2) there is a material dispute of fact regarding Restaurant Worker Bing Wu's and Restaurant Worker Jun Zhang's claims against Hsiang I Chang for intentional infliction of emotional distress and negligent infliction of emotional distress, and regarding Restaurant Worker Bing Wu's claim against Wei Wei Chang for intentional infliction of emotional distress; (3) as a matter of law, Hsiang I Chang violated the Connecticut Unfair

Trade Practices Act; and (4) Hsiang I Chang and Le Shih Chang should be held personally liable for the LLC and the Inc.'s violations of CUTPA and inflictions of emotional distress. Plaintiffs' arguments involve both presentation of facts and detailed analysis of several distinct areas of state and federal law.

Plaintiffs' counsel attempted to truncate the brief as much as possible, but submit that in order to adequately support the arguments presented, counsel was compelled to prepare an overlength brief.

WHEREFORE, the Plaintiffs respectfully request that the Court grant their unopposed request for a twelve (12) page extension for their Memorandum in Opposition to Defendants' Motion for Summary Judgment.

Respectfully submitted,

/s/

Muneer Ahmad, Esq., ct28109 Susan Hazeldean, Esq., ct28093 Ohad Barkan, Law Student Intern William C. Collins, Law Student Intern Jerome N. Frank Legal Services Organization P.O. Box 209090 New Haven, CT 06520-9090

Telephone: (203) 432-4800 Facsimile: (203) 432-1426

Email: muneer.ahmad@yale.edu

Counsel for Plaintiffs

## **CERTIFICATE OF SERVICE**

I hereby certify that on February 8, 2010, a copy of foregoing Motion was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/

Muneer Ahmad, Esq.
Jerome N. Frank Legal Services Organization
P.O. Box 209090
New Haven, CT 06520-9090
203-432-4800