

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

DENNIS L. MONTGOMERY

Plaintiff,

v.

JAMES RISEN, ET AL.,

Defendants.

Civil Action No. 1:15-cv-20782-JEM

**PLAINTIFF'S OPPOSITION TO MOTION TO EXCEED PAGE LIMITATIONS FOR  
SUMMARY JUDGMENT AND STATEMENT OF FACTS**

Plaintiff opposed the request to exceed the page limit because the amount of extra pages proposed was "excessive." Plaintiff's counsel asked that his full position be included in any motion, but Defendants counsel intentionally left this out.

Plaintiff and his counsel have reason to believe that the requested excess pages will be primarily used to wage ad hominem personal attacks, belittling Plaintiff's state of deteriorating health (as they attempted before Judge Martinez during the first status conference and in subsequent proceedings, such as at Plaintiff's deposition), and disparaging and degrading Plaintiff's counsel, as they have done in the past. All of this is purely for strategic reasons and has no relevance.

Accordingly, Plaintiff and his counsel do not see the need to exceed the standard page limit as set forth in this Court's local rules so the space can be used for these personal and unnecessary ad hominem attacks.

Dated: December 9, 2015

Respectfully submitted,

/s/ Larry Klayman  
Klayman Law Firm  
FL Bar No. 246220  
7050 W Palmetto Park Rd.  
Suite 15-287  
Boca Raton, FL 33433  
(310) 595-0800  
leklayman@gmail.com

Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 9th day of December, 2015, a true and correct copy of the foregoing was filed and served via CM/ECF upon the following:

**Sanford Lewis Bohrer**

**Brian Toth**

Holland & Knight, LLP

Suite 3000

701 Brickell Ave

Miami, FL 33131

Email: sbohrer@hklaw.com

Email: brian.toth@hklaw.com

**Laura R. Handman**

**Micah Ratner**

Davis Wright Tremaine LLP

1919 Pennsylvania Ave., N.W., Suite 800

Washington D.C. 20006-3401

Email: laurahandman@dwt.com

Email: MicahRatner@dwt.com

*Attorneys for Defendants*

/s/ Larry Klayman

Larry Klayman, Esq.