

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 08-11955-DJC

STACEY HIGHTOWER,
Plaintiff

v.

**CITY OF BOSTON and BOSTON
POLICE COMMISSIONER
EDWARD DAVIS**
Defendants

**DEFENDANTS, CITY OF BOSTON AND COMMISSIONER EDWARD DAVIS'S
MOTION FOR LEAVE TO FILE A MEMORANDUM OF LAW
IN EXCESS OF PAGE LIMITS**

Now come the Defendants, City of Boston and Commissioner Edward Davis ("City Defendants") by and through undersigned counsel, and hereby seek leave of Court, pursuant to Local Rule 7.1(b)(4), to file a Memorandum of Law in Support of their Opposition to Plaintiff's Motion for Summary Judgment and Cross-Motion for Summary Judgment in excess of page limits. The City Defendants seek leave to file a memorandum of law not to exceed thirty-five pages. As grounds, the City Defendants state that this case involves constitutional issues arising from the revocation of Plaintiff's firearm license in 2008. In order to analyze all of Plaintiff's constitutional claims within the appropriate legal frameworks, additional space is required.

For the reasons described herein, the City Defendants request that they be allowed to file a Memorandum of Law in Support of their Opposition to Plaintiff's Motion for Summary Judgment and Cross-Motion for Summary Judgment that does not exceed thirty-five pages, which includes thirty-four pages of argument with a conclusory and signatory page being the thirty-fifth.

CERTIFICATE OF SERVICE

I hereby certify that on this day, a copy of this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

4/22/2011 /s/ Lisa Skehill Maki
Date Lisa Skehill Maki

Respectfully submitted,
DEFENDANTS, CITY OF BOSTON and
BOSTON POLICE COMMISSIONER EDWARD
DAVIS
William F. Sinnott,
Corporation Counsel

By their attorneys,

/s/ Lisa Skehill Maki
Lisa Skehill Maki, BBO # 675344
Ian D. Prior, BBO # 655704
Assistant Corporation Counsel
City of Boston Law Department
One City Hall Plaza, Room 615
Boston, MA 02201
(617) 635-4022 (Maki)
(617) 635-4017 (Prior)
Lisa.Maki@cityofboston.gov
Ian.Prior@cityofboston.gov