

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**ARAB AMERICAN CIVIL RIGHTS  
LEAGUE**, et al.,

*Plaintiffs*,

v.

**DONALD TRUMP**, et al.,

*Defendants*.

Case No. 2:17-cv-10310-VAR-SDD

Hon. Victoria A. Roberts

Mag. J. Stephanie D. Davis

**UNOPPOSED *EX PARTE* MOTION FOR LEAVE TO  
EXCEED PAGE LIMITATIONS**

Plaintiffs, by and through counsel, hereby move under L.R. 7.1(d)(3)(A) for leave to file over length briefing in support of Plaintiffs' forthcoming Motion to Compel. Plaintiffs seek leave to file a brief not to exceed thirty pages. Defendants have notified Plaintiffs that they concur with this request.

In support of this request, Plaintiffs state the following:

- 1) Local Rule 7.1(d)(3)(A) generally provides for a twenty-five-page limit for opening briefs. However, the Rule also provides that a party "seeking to file a longer brief may apply ex parte in writing setting for the reasons."
- 2) On May 11, 2017, the Court entered an order directing Defendants to "produce the document responsive to document request 1 by May 19,

2017” and, “[i]f Defendants object to any discovery request, [to] set forth their reasoning and legal justification, with full citations and argument, in the response to Plaintiffs.” The Order further stated, “If Plaintiffs file a motion to compel . . . the Court will treat [Defendants’ objections] as the Defendants’ brief for deciding the motion.” (ECF # 89)

- 3) On May 19, 2017, Defendants served “Defendants’ Response and Objections to Plaintiffs’ First Set of Document Requests, Request No. 1.” This document is 34 pages long, not including signature pages or exhibits.
- 4) Plaintiffs intend to file a motion to compel the production of the document sought in Document Request 1.
- 5) Plaintiffs hereby seek leave to file a memorandum in support of their motion to compel that is thirty pages in length. Defendants claim that they are entitled to resist production of the Giuliani Memorandum on a variety of grounds, including but not limited to arguing that: this Court lacks the power to order Defendants to respond to discovery; the Memorandum is not relevant to any of Plaintiffs’ claims; Defendants may not have possession, custody, or control of the Memorandum; it is too burdensome for Defendants to search for the Memorandum to determine whether it exists; and the Memorandum, if it exists, could be protected by legal privileges that Defendants and third parties should be allowed to assert in

the future if their other objections are overruled. Although Plaintiffs believe that these objections lack merit, Plaintiffs seek an extension of five pages beyond the usual limit to respond fully to Defendants' objections.

- 6) On May 23, 2017, the Parties held a meet-and-confer to discuss Defendants' response. At that time, counsel for Defendants stated that they do not object to Plaintiffs requesting permission to file a thirty-page brief in support their motion to compel.
- 7) Plaintiffs submit that this extension request is not for an improper purpose and will not prejudice either side.

For these reasons, Plaintiffs respectfully request that this Court grant this unopposed motion for leave for Plaintiffs to file a brief in support of their motion to compel not to exceed 30 pages.

Dated: May 24, 2017

Respectfully submitted,

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**[PROPOSED] ORDER GRANTING PLAINTIFFS'  
UNOPPOSED EX PARTE MOTION  
FOR LEAVE TO EXCEED PAGE LIMITATIONS**

It is hereby ORDERED that Plaintiffs' Motion for Leave to Exceed Page Limitations is GRANTED. Plaintiffs may file a brief in support of their forthcoming motion to compel that is 30 pages long, exclusive of signature pages.

**IT IS ORDERED.**

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Victoria A. Roberts  
United States District Judge

Dated: \_\_\_\_\_