

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JULIO SUAREZ,)	Case. No. 1:14-CV-968
)	
Plaintiff,)	Hon William W. Caldwell
)	
v.)	
)	
ERIC H. HOLDER, JR., Attorney General)	
of the United States, and B. TODD JONES,)	
Director of the Bureau of Alcohol, Tobacco,)	
Firearms and Explosives,)	
)	
Defendants.)	
)	

PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO FILE COMBINED BRIEF
IN EXCESS OF WORD AND PAGE LIMITS

Plaintiff respectfully requests this Honorable Court for Leave to file a combined brief in support of his forthcoming motion for summary judgment, and in opposition to Defendants' motion to dismiss or for summary judgment, said combined brief not to exceed forty pages, or 13,320 words.

Plaintiff has met and conferred with counsel for the Defendants, who do not oppose the granting of this motion.

In support of his motion, Plaintiff states:

1. On October 16, 2014, the Court granted Defendants' unopposed motion to file a brief not exceeding 36 pages in support of their motion responding to the Complaint.
2. On October 20, 2014, Defendants responded to the complaint with a motion to dismiss or, in the alternative, for summary judgment. The brief in support of this motion was 34

pages long. Defendants also submitted eighteen exhibits, some quite voluminous, in support of their motion.

3. Pursuant to operation of LR 7.6 and Fed. R. Civ. P. 6(d), Plaintiff's brief in opposition to Defendants' motion is due November 13, 2014. "No brief may incorporate by reference all or any portion of any other brief." LR 7.8(a). Briefs are limited by rule to 15 pages or 5,000 words. LR 7.8(b).

4. Plaintiff intends to move for summary judgment. The arguments in support of, and in opposition to, the parties' cross-motions, overlap. In the interest of judicial economy, and considering LR 7.8(a), Plaintiff seeks to file a single brief that both supports his motion and opposes that of the Defendants.

5. Owing to the complexity of the issues, and to the voluminous briefing submitted by Defendants, Plaintiff requests that his combined brief be limited to 40 pages or 13,320 words, although counsel always aspires not to fully utilize any page or word limit.

Wherefore, Plaintiff respectfully requests that on or by November 13, 2014, he be allowed to file a combined brief in support of his own motion for summary judgment, and in opposition to Defendants' dispositive motion, not to exceed 40 pages or 13,320 words.

Dated: October 28, 2014

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2014, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Alan Gura

Alan Gura