

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

<b>BARBARA ANN WILSON,</b>	)	
	)	
	)	<b>2:10-cv-02386-KOB</b>
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>THE CITY OF BIRMINGHAM;</b>	)	
<b>et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFF’S MOTION TO ALLOW ADDITIONAL PAGES**

The Plaintiff, through undersigned counsel, respectfully requests an Order allowing additional pages in her contemporaneously filed brief in Response to Defendants’ Motion for Summary Judgment. As support for this Motion, the Plaintiff states the following:

1. This case is being prosecuted against two Defendants.
2. A total of ten depositions were taken in the case the transcripts of which are comprised of several hundred pages and to which the Plaintiff alone, attached 36 exhibits. The depositions covered facts occurring over a several year period.
3. The Defendants posited a number of legal arguments in their brief to

which the Plaintiff responded.

4. The Plaintiff endeavored to be concise and address only material, relevant factual and legal issues which are before the Court. Nonetheless, due to the breadth of the testimony and importance of the issues in the case, the Plaintiff's brief exceeds the 30 page limit set by this Court's Order pertaining to dispositive motions. Not counting the cover page, table of contents or certificate of service, the Plaintiff's brief totals 40 pages.
5. The Plaintiff would suffer severe prejudice should any portion of her brief and attendant legal and factual arguments be stricken.
6. The Defendants will suffer no prejudice should this Motion be granted.

WHEREFORE, the Plaintiff respectfully requests entry of an Order allowing her to file additional pages in her brief in Response to Defendant's Motion for Summary Judgement.

Respectfully submitted,

*s/Adam P. Morel*

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Adam P. Morel

**ATTORNEY FOR THE PLAINTIFF**

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 17, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

*s/Adam P. Morel*  
OF COUNSEL