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10 Counsel for Plaintiff

11  
 12 IN THE UNITED STATES DISTRICT COURT  
 13 FOR THE STATE OF ARIZONA

14 MARTIN H. ESCOBAR  
 15 Plaintiff,  
 16 v.  
 17 JAN BREWER, Governor of  
 18 the State of Arizona, in her  
 19 Official and Individual  
 20 Capacity, the City of Tucson,  
 a municipal corporation, and  
 Barbara LaWall, County  
 Attorney, Pima County,  
 21 Defendants.

No. CV 10-249 TUC DCB

REQUEST TO EXCEED PAGE  
 LIMITATION IN MEMORANDUM  
 OF POINTS AND AUTHORITIES TO  
 MOTION FOR PRELIMINARY INJUNCTION

22  
 23 Pursuant to LRCiv 7.2.(e), Plaintiff hereby request permission to exceed the 17  
 24 page limitation set forth in the instant local rule by filing a memorandum of points and  
 25 authorities in support of his Motion for Preliminary Injunction that contains up to 35  
 26 pages (excluding exhibits).

27 This request is made in order to provide Plaintiff with the opportunity to set forth  
 28 in detail the law and facts supporting his request for a preliminary injunction. The

1 applicable law and the material facts are complex and require a detailed explanation.  
2 Additionally, the preliminary equitable relief sought in the memorandum is critical to  
3 protecting the interests of local law enforcement officers, all Latinos citizens, residents,  
4 and guests of Arizona, and all persons present within the State of Arizona as of the  
5 effective date of the "Support Our Law Enforcement and Safe Neighborhoods Act,"  
6 Senate Bill 1070, as amended by House Bill 2162, which is July 29, 2010.

7 Plaintiff's request is reasonable, appropriate and will not prejudice the interests  
8 of any responding party.

9 For the reasons noted, Plaintiff respectfully requests the Court for leave to  
10 exceed the page limitation set forth in the Local Rules and submit a memorandum of  
11 points and authorities up to 35 pages in length.

12 Respectfully submitted this 31<sup>st</sup> day of May 2010.

13 s/Richard M. Martinez, Esq.  
14 RICHARD M. MARTINEZ, ESQ.

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16 Augustine B. Jimenez III  
17 **MONTOYA JIMENEZ, P.A.**  
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19 3200 North Central Avenue, Suite 2550  
20 Phoenix, Arizona 85012

21 Counsel for Plaintiffs

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1 Copy electronically transmitted  
2 this 31<sup>st</sup> day of May 2010  
3 via the USDC Clerk of Court  
4 using the CM/ECF System for  
5 filing and transmittal to:

6 Michael Rankin, City Attorney  
7 City of Tucson  
8 Michael W.L. McCory  
9 Principal Assistant City Attorney  
10 P.O. Box 2710  
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12 Attorneys for the City of Tucson

13 John J. Bouma  
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17 One Arizona Center  
18 400 East Van Buren  
19 Phoenix, Arizona 85004-2202

20 Joseph A. Kanfield  
21 Office of Governor Janice K. Brewer  
22 1700 West Washington, 9<sup>th</sup> Floor  
23 Phoenix, Arizona 85007  
24 Attorneys for Defendant Governor Janice K. Brewer

25 COPY of the foregoing e-mailed  
26 this 31<sup>st</sup> day of May 2010 to:

27 Barbara LaWall  
28 County Attorney-Pima County  
29 200 West Washington  
30 Tucson, Arizona 85701

31 Defendant

32 s/Richard M. Martinez, Esq.

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