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 8 MARLENE PEREZ AND ROSA CERISANO

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 10 **UNITED STATES DISTRICT COURT**  
 11 **NORTHERN DISTRICT OF CALIFORNIA**

13	MARLENE PEREZ, an individual, and ROSA CERISANO, an individual,	)	CASE NO. 15-01792 HSG
14		)	PLAINTIFFS' MOTION FOR
15	Plaintiff,	)	ADMINISTRATIVE RELIEF TO
16		)	FILE EXCESS PAGES OR,
17	vs.	)	ALTERNATIVELY, TO FILE
18	JOHN MUIR HEALTH, a California corporation, JOHN MUIR MEDICAL CENTER, an unknown business entity, and DOES 1-20, et al	)	SEPARATE EVIDENTIARY
19		)	OBJECTIONS; ORDER
20	Defendants.	)	Hon. Judge Haywood S. Gilliam, Jr.
21		)	Complaint Filed: April 21, 2015

1                   **TO THIS HONORABLE COURT, ALL PARTIES AND THEIR**  
2 **ATTORNEYS OF RECORD:**

3                   **PLEASE TAKE NOTICE** that pursuant to Local Rule 7-11, Plaintiffs  
4 Marlene Perez and Rose Cerisano (“Plaintiffs”), hereby move this Court for an  
5 order granting leave for Plaintiffs to file a Memorandum in support of their  
6 Opposition to Defendant John Muir Health’s (“Defendant”) Motion for Summary  
7 Judgment, or, alternatively, for leave to file a separate pleading, to not exceed five  
8 pages, containing Plaintiffs’ objections to the evidence offered by Defendant in  
9 support of its Motion for Summary Judgment.

10                   Good cause exists for the relief sought. Northern District Local Rule 7-4(b)  
11 limits briefs to 25 pages. However, Local Rule 7-11 permits a party to move for  
12 administrative relief to exceed the page limit. Defendant’s Memorandum in  
13 support of its Motion for Summary Judgment includes seven separate declarations.  
14 (Docs. #70-1 through 70-11.) (Declaration of Elizabeth L. Bradley [“Bradley  
15 Decl.”], ¶ 2.] Including exhibits, these declarations span 557 pages. (*Id.*)  
16 Plaintiffs have made an earnest effort to conform to the page limit specified in  
17 Local Rule 7-4(b). (Bradley Decl., ¶ 3.) However, Plaintiffs’ necessary  
18 evidentiary objections cause the Opposition to exceed 25 pages. (*Id.*)

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1 Plaintiffs' counsel has attempted to informally resolve this issue with  
2 Defendant's counsel by securing a stipulation to the relief requested herein.  
3 (Bradley Decl., ¶ 4, Ex. 1.) However, Defendant's counsel declined to stipulate to  
4 the requested relief. (*Id.*) Accordingly, Plaintiffs request this Court grant them  
5 leave to file a Memorandum in support of their Opposition with an additional five  
6 pages, or, alternatively, to file a separate pleading, not to exceed five pages,  
7 containing Plaintiffs' evidentiary objections.

8  
9 Dated: May 23, 2016

Respectfully Submitted,

ROSEN SABA LLP

10  
11 By: /s/ Elizabeth L. Bradley  
12 JAMES R. ROSEN  
13 ELIZABETH L. BRADLEY  
14 Attorneys for Plaintiffs  
15 MARLENE PEREZ AND ROSA  
16 CERISANO

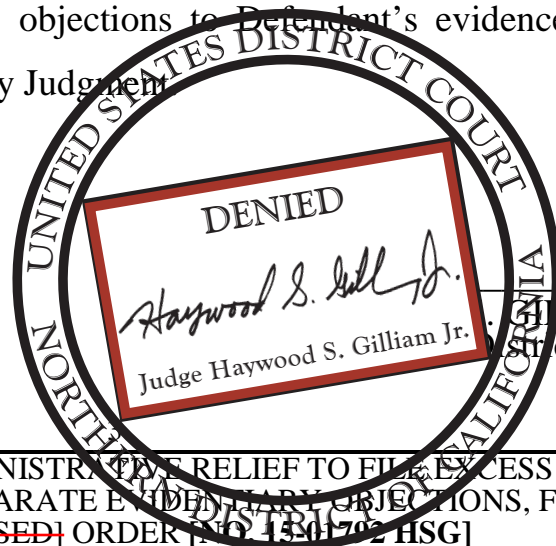
17 **ORDER**

18 Having reviewed the materials submitted by the parties, the Court finds that  
19 good cause exists for the relief sought by Plaintiffs.

20 Plaintiffs' may file a Memorandum in support of their Opposition to  
21 Defendant's Motion for Summary Judgment with an additional five pages, or, in  
22 the alternative, Plaintiffs may file a separate pleading, to not exceed five pages,  
23 exclusively containing Plaintiffs' objections to Defendant's evidence offered in  
24 support of its Motion for Summary Judgment.

IT IS SO ORDERED.

25  
26 Dated: 5/24/2016



27 WILLIAM, JR.  
28 District Judge

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**PROOF OF SERVICE**

STATE OF CALIFORNIA )  
 )ss  
COUNTY OF LOS ANGELES )

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 9350 Wilshire Blvd., Suite 250, Beverly Hills, CA 90212.

On **May 23, 2016**, I served the foregoing document described as: **PLAINTIFFS' MOTION FOR ADMINISTRATIVE RELIEF TO FILE EXCESS PAGES OR, ALTERNATIVELY, TO FILE SEPARATE EVIDENTIARY OBJECTIONS, FOR GOOD CAUSE; [PROPOSED] ORDER**, on the interested parties in this action by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Michael D. Bruno, Esq.  
Hieu Tran, Esq.  
GORDON & REES LLP  
275 Battery Street, Suite 2000  
San Francisco, CA 94111  
Telephone: (415) 986-5900  
Facsimile: (415) 986-8054  
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By electronic transmission to all parties at the recipients at the electronic address above by using the Court's CM/ECF electronic filing system.

FEDERAL I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on **May 23, 2016**, at Beverly Hills, California.

\_\_\_\_\_  
/s/ Elizabeth L. Bradley, Esq.  
Elizabeth L. Bradley