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8 Attorneys for Plaintiff GARY RICHARD LAWMAN  
 9 by and through his Guardian ad Litem Richard de Villiers

10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA  
 12 OAKLAND DIVISION

13 GARY RICHARD LAWMAN by and  
 14 through his Guardian ad Litem Richard de  
 15 Villiers,

16 Plaintiff,

17 v.

18 CITY AND COUNTY OF SAN  
 19 FRANCISCO; PHILLIP M. GORDON;  
 20 GLEN PAUL MINIOZA; BRIAN W.  
 21 KNEUKER; CARLOS GUTIERREZ;  
 22 CRAIG F. TOM; PATRICK F. PENE;  
 23 JULIO C. PALENCIA; ANDREW N.  
 24 BROWN; PAUL E. RAPICAVOLI;  
 25 MATTHEW M. O'SHEA; MICHAEL  
 26 HENNESSEY; GREG SUHR; ROEL L.  
 27 LAPITAN; FRANK LATKO a.k.a.  
 28 FRANZI LATKO; and DOES 1 through  
 50, inclusive,

Defendants.

CASE NO. C15-01202-DMR

**ADMINISTRATIVE MOTION FOR  
 LEAVE TO FILE MEMORANDUM IN  
 EXCESS OF 25 PAGES AND [PROPOSED]  
 ORDER**

Hearing Date: December 17, 2015  
 Time: 11:00 a.m.  
 Place: Courtroom 4, 3<sup>rd</sup> Floor  
 Judge: Hon. Donna M. Ryu

Action Filed: December 31, 2013  
 Removal: March 13, 2015  
 Trial Date: June 6, 2016

1 Pursuant to Civil Local Rule 7-11, Plaintiff respectfully requests leave to file a  
2 memorandum opposing Defendants' motion for summary judgment in excess of the 25-page  
3 limit for memorandum, set forth in Local Rule 7-4(b).

4 Defendants' motion for summary judgment, seeking judgment on each and every one of  
5 Plaintiff's eight causes of action against numerous defendants, is exactly 25 pages. However,  
6 Defendants have omitted many crucial portions of the voluminous record developed in this case,  
7 which includes 12 depositions and more than 1000 pages of documents produced. In order to  
8 provide the Court with an accurate and complete account of the facts of the case, Plaintiff will  
9 likely need additional space. Also, Plaintiff will likely need more pages to present arguments  
10 relating to each of the several claims and defenses at issue here.

11  
12 Dated: November 19, 2015

LAW OFFICE OF JOSEPH S. MAY

13  
14 /s/ Joseph S. May

15 By: JOSEPH S. MAY, Attorneys for Plaintiff  
16 GARY RICHARD LAWMAN

17 **DECLARATION OF JOSEPH S. MAY [Local Rule 7-11(a)]**

18 I, Joseph S. May, declare:

19 I asked the City Attorney's office to stipulate but they refused.

20  
21 I declare under penalty of perjury under the laws of the state of California and the United  
22 States that the foregoing is true and correct.

23  
24 Executed on November 19, 2015, at San Francisco, California.

25  
26 /s/ Joseph S. May

27 JOSEPH S. MAY  
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**[PROPOSED] ORDER**

For good cause shown, Plaintiff is hereby granted leave to file a memorandum in opposition to the Defendants' motion for summary judgment up to but not exceeding 30 pages.

SO ORDERED.

Dated: November 20, 2015

