

1 CHERYL D. ORR (State Bar No. 143196)  
 HEATHER M. SAGER (State Bar No. 186566)  
 2 SUSAN B. BURR (State Bar No. 104269)  
 S. FEY EPLING (State Bar No. 190025)  
 3 DRINKER BIDDLE & REATH LLP  
 50 Fremont Street, 20th Floor  
 4 San Francisco, California 94105-2235  
 Telephone: (415) 591-7500  
 5 Facsimile: (415) 591-7510  
 E-mail: [cheryl.orr@dbr.com](mailto:cheryl.orr@dbr.com)  
 6 [heather.sager@dbr.com](mailto:heather.sager@dbr.com)  
[susan.burr@dbr.com](mailto:susan.burr@dbr.com)  
 7

8 Attorneys for Defendant  
 RGIS, LLC, erroneously sued herein as RGIS INVENTORY  
 9 SPECIALISTS, INC.

10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA  
 12 SAN FRANCISCO DIVISION

13 TRISHA WREN, ET AL.,

14 Plaintiffs,

15 v.

16 RGIS INVENTORY SPECIALISTS, INC.,

17 Defendant.  
 18

Case No. 3:06-CV-5778 (JCS)

**DEFENDANT RGIS, LLC'S  
 ADMINISTRATIVE REQUEST TO  
 EXCEED PAGE LIMITATIONS  
 GOVERNING RGIS, LLC'S MOTION TO  
 DECERTIFY COLLECTIVE ACTION**

[N.D. L.R. 7-4 and 7-11]

19 Pursuant to Northern District of California Civil Local Rule 7-11, Defendant RGIS, LLC  
 20 ("RGIS") respectfully moves the Court for permission to file a Memorandum of Points and  
 21 Authorities in support of its Motion to Decertify Plaintiffs' Collective Action ("Motion") that  
 22 exceeds the twenty-five page limit in Civil Local Rule 7.2(b).

23 Good cause exists for RGIS' Motion to exceed the current page limitation. Plaintiffs  
 24 assert several different claims under the Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 201 *et*  
 25 *seq.* on behalf of a nationwide class of current and former RGIS non-exempt inventory  
 26 employees. Plaintiffs allege that RGIS failed to compensate employees for 1) time spent  
 27 donning equipment; 2) time spent "engaged to wait" for inventories to begin; 3) time spent  
 28 waiting for transportation to or from an inventory; and 4) time spent in RGIS-provided

1 transportation to and from inventory sites.

2 Due to the complex nature and the enormity of the issues raised in this case, additional  
3 pages are required for RGIS to effectively address each of Plaintiffs' claims, as well as to  
4 provide the Court with a clear and precise explanation of the factual background and legal  
5 arguments associated with its Motion. RGIS anticipates filing a Motion that is no more than  
6 thirty pages in length.

7 RGIS has met and conferred with Plaintiffs' counsel in good faith. Plaintiffs' counsel has  
8 agreed to allow RGIS to file a Memorandum of Points and Authorities supporting its Motion not  
9 to exceed 30 pages and formatted in conformance with Local Rule 3-4(c). The parties'  
10 Stipulation and Proposed Order is filed herewith.

11 Accordingly, for the reasons stated above, RGIS respectfully requests that the Court grant  
12 its motion to exceed page limitations and allow RGIS a total of thirty (30) pages for its Motion.

13  
14 Respectfully submitted,

15 Dated: October 6, 2008

DRINKER BIDDLE & REATH LLP

16  
17 /s/ S. Fey Epling /s/

S. Fey Epling  
Attorneys for Defendant RGIS, LLC