

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA

MAUREEN TOFFOLONI, )  
as Administratrix and Personal )  
Representative of the )  
ESTATE OF NANCY E. BENOIT, )  
 )  
Plaintiff, )

v. )

CIVIL ACTION  
FILE NO. 1:08-CV-0421-TWT

LFP PUBLISHING GROUP, LLC, )  
d/b/a Hustler Magazine, )  
MARK SAMANSKY, an Individual, )  
and other distributors and sellers of, )  
Hustler Magazine, as )  
Defendants X, Y, and Z, )  
 )  
Defendants. )

**CONSENT MOTION OF PLAINTIFF TO  
EXTEND PAGE LIMITATION AND BRIEF IN SUPPORT THEREOF**

COMES NOW Plaintiff, Maureen Toffoloni, as Administratrix and  
Personal Representative of the Estate of Nancy E. Benoit (“Plaintiff”), through  
counsel, and pursuant to Rule 7.1(D) of the Local Rules of the Northern District of  
Georgia, and with the knowledge and consent of counsel for Defendants, file this  
Consent Motion to Extend the Page Limitation on her Response to Defendants’  
Motions for Summary Judgment.

This Court is authorized to grant Plaintiff's Motion under Rule 7.1(D) of the Local Rules for the Northern District of Georgia. Rule 7.1(D) provides in part that, "[a]bsent prior permission of the court, briefs filed in support of a motion or in response to a motion are limited in length to twenty-five (25) pages."

Plaintiff requests that this Court extend the page limitation of Plaintiff's Response Brief from twenty-five (25) pages to thirty (30) pages. In its Response Brief, Plaintiff addresses several complex legal issues that require a limited extension of the number of pages allowed by this Court for such Response.

Plaintiff is concurrently filing with this Motion a Consent Order granting its Motion, and is authorized to represent that Defendant, through its counsel, has been notified of Plaintiff's Consent Motion and has agreed to this page limit extension.

Plaintiff therefore respectfully requests that the Court extend the page limitation for Plaintiff's Brief in Response to Defendant's Motion for Summary Judgment from twenty-five (25) pages to thirty (30) pages.

Respectfully submitted August 31, 2010.

*/s/ Richard P. Decker*

RICHARD P. DECKER

State Bar of Georgia #215600

F. EDWIN HALLMAN, JR.

State Bar of Georgia #319800

RICHARD A. WINGATE

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For HALLMAN & WINGATE, LLC  
Attorneys for Plaintiff

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**CONSENT ORDER**

Having read the Consent Motion of Plaintiff to extend the page limitation for filing Plaintiff's Response to Defendant's Motion for Summary Judgment from twenty-five (25) pages to thirty (30) pages, pursuant to Local Rule 7.1(D) of the Northern District of Georgia, and for good cause shown, Plaintiff's Motion is hereby GRANTED, and Plaintiff shall be allowed thirty (30) pages in its Response to Defendant's Motion for Summary Judgment.

This the \_\_\_\_\_ day of \_\_\_\_\_, 2010.

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Hon. Thomas W. Thrash, Jr.  
United States District Judge

Submitted by:

/s/ Richard P. Decker

RICHARD P. DECKER  
State Bar of Georgia #215600

For HALLMAN & WINGATE, LLC  
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**CERTIFICATE OF SERVICE**

This is to certify that on August 31, 2010, I have electronically filed the foregoing Consent Motion to Extend Page Limitation with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorney(s) of record:

James Clifton Rawls, Esq.  
S. Derek Bauer, Esq.  
Barry J. Armstrong, Esq.

Darrell Jay Solomon, Esq.  
Jeffrey F. Reina, Esq.  
Paul J. Cambria, Esq.

and by placing a copy of same in the United States Mail in a properly addressed envelope with adequate postage thereon to:

William M. Feigenbaum, Esq.  
Lipsitz, Green, Scime, Cambria, LLP  
42 Delaware Avenue, Suite 120  
Buffalo, NY 14202

*/s/ Richard P. Decker*  
\_\_\_\_\_  
RICHARD P. DECKER  
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