

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**GEORGIA LATINO ALLIANCE** \*

**FOR HUMAN RIGHTS, et al.,** \*

**Plaintiffs** , \*

**V.** \*

**1:11-CV-1804-TWT**

**NATHAN DEAL, Governor of the** \*

**State of Georgia, et al.,** \*

**Defendants.** \*

**AMENDED MOTION TO EXCEED TWENTY-FIVE PAGE LIMIT**

Defendants Nathan Deal; Samuel S. Olens, Clyde L. Reese, III, and Mike Beatty respectfully request leave to file their Brief in support of their Motion to Dismiss which exceeds the twenty-five page limit for Briefs under Local Rule 7.1. Defendants show that it is necessary for Defendants to exceed the usual page limit in order to fully respond to Plaintiff's complaint.

Plaintiffs have filed an 80-page, 195-paragraph Complaint, enumerating six counts on behalf of 21 Plaintiffs. The Plaintiffs pose a facial constitutional challenge to a state statute and seek to enjoin its effect. Plaintiffs have filed a Brief in Support of their Motion for Preliminary Injunction which is 60 pages in length. In addition to failure to state a claim, Defendants' brief will address issues of

associational and individual standing and immunity. Defendants believe that the brief they submit will assist the Court in the resolution of this case, as well as the pending motion seeking preliminary injunctive relief. Defendants believe that the additional pages are required to adequately address the issues involved.

For the foregoing reasons, Defendants Nathan Deal, Samuel S. Olens, Clyde L. Reese, III, and Mike Beatty respectfully request that this Court grant their Motion to Exceed Twenty-Five Page Limit and allow them to file a brief that is no longer than 65 pages in length.

This 9th day of June, 2011.

Respectfully submitted,

SAMUEL S. OLENS                      551540  
Attorney General

KATHLEEN PACIOUS                558555  
Deputy Attorney General

/s/ Devon Orland  
DEVON ORLAND                      554301  
Sr. Assistant Attorney General

Please Address All  
Communications To:

Devon Orland  
40 Capitol Square, S.W.  
Atlanta, GA 30334-1300  
(404) 463-8850 / Fax: (404) 651-5304

## **CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1(D), I hereby certify that the foregoing has been prepared in compliance with Local Rule 5.1(B) in 14-point New Times Roman type face.

This the 9th day of June, 2011.

/s/ Devon Orland

DEVON ORLAND 554301

Sr. Assistant Attorney General

40 Capitol Square, S.W.  
Atlanta, GA 30334-1300  
(404) 463-8850 (Telephone)  
(404) 651-5304 (Fax)  
Email: Dorland@law.ga.gov

## **CERTIFICATE OF SERVICE**

I hereby certify that on this date I electronically filed the foregoing **AMENDED MOTION TO EXCEED PAGE LIMIT** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

|                                 |                            |
|---------------------------------|----------------------------|
| Joaquin@nilc.org                | ojadwat@aclu.org           |
| Tumlin@nilc.org                 | asegura@aclu.org           |
| Preciado@nilc.org               | emukherjee@aclu.org        |
| Keaney@nilc.org                 | cwang@aclu.org             |
| Broder@nilc.org                 | kdesormeau@aclu.org        |
| Blazer@nilc.org                 | cfjackson@acluga.org       |
| naomi.tsu@splcenter.org         | ashahshahani@acluga.org    |
| michelle.lapointe@splcenter.org | Bspears@mindspring.com     |
| daniel.werner@splcenter.org     | CKuck@immigration.net      |
| mary.bauer@splcenter.org        | DConley@timmigration.net   |
| andrew.turner@splcenter.org     | sinyenL@asianlawcaucus.org |
| samuel.brooke@splcenter.org     |                            |

I further certify that I have served, by U.S. mail, first class postage prepaid, the following non-CM/ECF participants: NONE.

This 9th day of June, 2011.

s/ Devon Orland

State Law Department  
40 Capitol Square SW  
Atlanta, GA 30334  
Tel: (404) 463-8850  
Fax: (404) 651-5304  
Email: dorland@law.ga.gov