

JUN 02 2011

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By: *[Signature]* Deputy Clerk

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

\_\_\_\_\_  
Georgia Latino Alliance for Human  
Rights, et al.,

Plaintiffs,

v.

Governor Nathan Deal, et al.,

Defendants.  
\_\_\_\_\_

Case No. **1:11-CV-1804**



**PLAINTIFFS' MOTION FOR LEAVE TO EXCEED PAGE LIMITS FOR  
MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

Pursuant to L.R. 7.1 D, Plaintiffs, by and through counsel, respectfully move the Court for leave to exceed the page limit for their Memorandum of Law ("Memorandum") in support of Plaintiffs' Motion for Preliminary Injunction. Plaintiffs anticipate that they will file their Motion for Preliminary Injunction within seven days, i.e., on or before June 9, 2011.

Plaintiffs are unable to comply with the 25-page limit set forth in L.R. 7.1 D because: (i) Plaintiffs challenge on myriad grounds the constitutionality of Georgia's expansive new state immigration system, as established by HB 87

(signed by Governor Nathan Deal on May 13, 2011); (ii) Plaintiffs' Memorandum addresses the many ways in which HB 87 violates the Supremacy Clause of the United States Constitution, the Fourth Amendment right to be free from unreasonable searches and seizures, and the Right to Travel; and (iii) Plaintiffs' Memorandum demonstrates that the harms that would result to Plaintiffs (which includes ten organizations and eleven individuals) and the public if HB 87 were permitted to go into effect are so substantial and irreparable that the Court should preliminarily enjoin its enforcement.

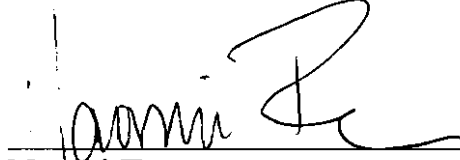
Although Plaintiffs have attempted to address all of these issues within the standard 25-page limit, they have been unable to do so given the complexity of HB 87 and the various claims of unconstitutionality that Plaintiffs raise. Permission to file a brief in excess of the page limit will provide Plaintiffs with sufficient opportunity to explain the facts and the law and aid this Court in its review of the arguments in support of their motion. Plaintiffs respectfully request that the Court allow them to file a fifty (50) page memorandum in support of their Motion for a Preliminary Injunction.

Dated: June 2, 2011

Respectfully submitted,<sup>1</sup>

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<sup>1</sup> Counsel certifies this document has been prepared in accordance with L.R. 5.1.



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\*Application for admission *pro hac vice* forthcoming