

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

SHANA SANDLER,

Plaintiff

v.

MIA CALCAGNI *et al*,

Defendants

Case No. 1:07-cv-00029

**PLAINTIFF'S MOTION TO EXCEED PAGE LIMITS IN RESPONDING TO
DEFENDANT BOOKSURGE'S MOTION FOR SUMMARY JUDGMENT
ON ALL CLAIMS OF PLAINTIFF**

Pursuant to Local Rule 7(e), Plaintiff Shana Sandler hereby moves for leave to file a Memorandum of Law in Opposition to Defendant Booksurge's Motion for Summary Judgment on All Claims of Plaintiff Shana Sandler in excess of twenty (20) pages in length. The grounds for this Motion are set forth in the incorporated Memorandum of Law.

MEMORANDUM OF LAW

Defendant Booksurge has filed a Motion for Summary Judgment which consists of 34 pages, together with a Statement of Material Facts consisting of 159 statements. Booksurge has moved for summary judgment on *multiple alternative grounds* on the six causes of action asserted by Plaintiff. In order to adequately address each issue raised in Defendants' Motion for Summary Judgment, together with the interrelated defenses asserted by Booksurge, Plaintiff will be required to exceed the twenty (20) page limit for dispositive motions set forth in Local Rule

7(e). Plaintiff's estimate of the length of its Memorandum is not expected to exceed forty (40) pages.

WHEREFORE, Plaintiff respectfully requests leave of Court pursuant to Rule 7(e) to file a Memorandum of Law that exceeds the twenty (20) page limit for dispositive motions.

Dated at Bangor, Maine, this 7th day of April, 2008.

PLAINTIFF, Shana Sandler,

By: /s/ Bernard J. Kubetz
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CERTIFICATE OF SERVICE

I, Bernard J. Kubetz, hereby certify that on April 7, 2008 I electronically filed the foregoing Plaintiff's Motion to Exceed Page Limits in Responding to Defendant Booksurge's Motion for Summary Judgment on All Claims of Plaintiff with the Clerk of the United States District Court using the CM/ECF system, which will send notification of such filing to the following:

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