

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE AT BANGOR

|                   |   |                            |
|-------------------|---|----------------------------|
| SHANA SANDLER,    | ) |                            |
|                   | ) |                            |
| Plaintiff         | ) |                            |
|                   | ) |                            |
| v.                | ) | Case No. 1:07-CV-00029-GZS |
|                   | ) |                            |
| MIA CALCAGNI,     | ) |                            |
| RALPH CALCAGNI,   | ) |                            |
| MAUREEN CALCAGNI, | ) |                            |
| PETER MARS,       | ) |                            |
| and               | ) |                            |
| BOOKSURGE, LLC,   | ) |                            |
|                   | ) |                            |
| Defendants.       | ) |                            |
|                   | ) |                            |

**BOOKSURGE, LLC’S MOTION TO EXCEED PAGE LIMITS TO  
REPLY TO PLAINTIFF’S MEMORANDUM IN OPPOSITION TO  
DEFENDANTS’ MOTIONS FOR SUMMARY JUDGMENT, AND  
INCORPORATED MEMORANDUM OF LAW**

Defendant BookSurge, LLC (“BookSurge”) moves for leave to file a Reply Memorandum to Plaintiff’s Memorandum in Opposition to Defendants’ Motions for Summary Judgment in excess of seven pages in length. The grounds for this Motion are set forth in the incorporated Memorandum of Law.

**MEMORANDUM OF LAW**

Plaintiff Shana Sandler (“Ms. Sandler”) filed a Memorandum in Opposition to Defendants’ Motions for Summary Judgment that is 27 pages and a Statement of Additional Material Facts that consists of 62 statements. Ms. Sandler has asserted six causes of action against BookSurge, and BookSurge moved for summary judgment on multiple alternative grounds. Because this case involves multiple causes of action and defenses, BookSurge respectfully requests leave of court to exceed the seven page limit

in Local Rules 7(c) & (e) to reply to Ms. Sandler's 27-page Memorandum in Opposition.  
BookSurge estimates that its Reply Memorandum will not exceed 20 pages.

**CONCLUSION**

BookSurge respectfully moves for leave to file a Reply Memorandum to Plaintiff's Memorandum in Opposition to Defendants' Motions for Summary Judgment that will not exceed 20 pages.

Respectfully submitted,

BOOKSURGE, LLC

By its attorneys,

/s/ Harold J. Friedman

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April 18, 2008

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| and               | ) |                            |
| BOOKSURGE, LLC,   | ) |                            |
|                   | ) |                            |
| Defendants.       | ) |                            |
|                   | ) |                            |

**CERTIFICATE OF SERVICE**

I hereby certify that on April 18, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Dennis Tessier  
Dennis Tessier