

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE AT BANGOR

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

MOTION OF DEFENDANT BOOKSURGE, LLC
FOR LEAVE TO EXCEED PAGE LIMITS
WITH INCORPORATED MEMORANDUM OF LAW

Pursuant to Local Rule 7(e), Defendant BookSurge, LLC (“BookSurge”) moves for leave to exceed page limits, not to exceed 35 pages, in support of its motion for summary judgment. The grounds for this Motion are fully set forth in the incorporated Memorandum of Law.

MEMORANDUM OF LAW

Plaintiff Shana Sandler’s (“Plaintiff”) Amended Complaint alleges six causes of action (intentional infliction of emotional distress, libel, libel per se, false light invasion of privacy, private facts invasion of privacy, and punitive damages), each of which involves multiple elements. Plaintiff’s libel, false light, and private facts claims are based on 12 statements included in a book printed by BookSurge – *Help Us Get Mia*. BookSurge intends to move for summary judgment and dismissal of all of the claims

asserted against it, asserting multiple alternative defenses for each cause of action and each statement.

BookSurge believes a comprehensive memorandum of law addressing each of the claims, underlying statements, and interrelated defenses will aid the Court and the other parties. To adequately address each issue arising out of Plaintiff's six causes of action, BookSurge believes, in good faith, that it will need to present its arguments in a memorandum of law that exceeds 20 pages. BookSurge also believes, particularly in light of the interrelated nature of some of the claims and defenses, that the Court will benefit from a single integrated memorandum of law. BookSurge, therefore, respectfully requests leave of Court pursuant to rule 7(e) to file a Memorandum of Law that exceeds the 20 page limit for dispositive motions by no more than 15 pages.

CONCLUSION

For the reasons cited herein, Defendant BookSurge, LLC respectfully asks this Court for leave to file a Memorandum of Law in support of its Motion for Summary Judgment of not more than 35 pages.

BOOKSURGE, LLC
By its attorneys,

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March 3, 2008

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CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2008, I electronically filed the Motion of Defendant BookSurge, LLC, for Leave to Exceed Page Limits with Incorporated Memorandum of Law with the Clerk of Court using the CM/ECF system which will send notification of such filings to the following counsel of record:

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