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LIONEL SAWYER & COLLINS
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Attorneys for Defendants FORUM SHOPS,
LLC, FORUM DEVELOPERS LIMITED
PARTNERSHIP, SIMON PROPERTY GROUP
LIMITED PARTNERSHIP, AND SIMON
PROPERTY GROUP, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PHASE II CHIN, LLC and LOVE & MONEY,
LLC (formerly dba O.P.M.L.V., LLC),

Plaintiffs,

v.

FORUM SHOPS, LLC, FORUM
DEVELOPERS LIMITED PARTNERSHIP,
SIMON PROPERTY GROUP LIMITED
PARTNERSHIP, SIMON PROPERTY
GROUP, INC., CAESARS PALACE CORP.,
and CAESARS PALACE REALTY CORP.

Defendants.

Case No. 2:08-cv-00162-JCM-GWF

**MOTION FOR ORDER EXTENDING
PAGE LIMIT FOR REPLY IN SUPPORT
OF MOTION TO DISMISS FROM 20
PAGES TO 30 PAGES**

AND

**REQUEST FOR EXPEDITED
CONSIDERATION**

Defendants FORUM SHOPS, LLC, FORUM DEVELOPERS LIMITED
PARTNERSHIP, SIMON PROPERTY GROUP LIMITED PARTNERSHIP and SIMON
PROPERTY GROUP, INC. (collectively "Defendants") respectfully move this Court for an
order extending the page limit for their Reply in Support of Motion to Dismiss by not to exceed

MOTION FOR ORDER EXTENDING PAGE LIMIT

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1 10 pages, from 20 pages to 30 pages. Defendants also respectfully request expedited
2 consideration of this motion because the current deadline for filing the subject Reply is Monday,
3 July 28, 2008. This motion is made and based on LR 7-4, the pleadings and documents on file
4 herein and the Memorandum of Points and Authorities that follows.

5 DATED this 25th day of July 2008.

6
7 LIONEL SAWYER & COLLINS

8 By: 

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19 LLC, FORUM DEVELOPERS LIMITED
20 PARTNERSHIP, SIMON PROPERTY
21 GROUP LIMITED PARTNERSHIP, AND
22 SIMON PROPERTY GROUP, INC.

23 **MEMORANDUM OF POINTS AND AUTHORITIES**

24 LR 7-4 provides:

25 Unless otherwise ordered by the court, pretrial and post-trial briefs and points and
26 authorities in support of, or in response to, motions shall be limited to thirty (30)
27 pages including the motion but excluding exhibits. Reply briefs and points and
authorities shall be limited to twenty (20) pages, excluding exhibits. Where the
court enters an order permitting a longer brief or points and authorities, the papers
shall include a table of contents and table of authorities.

Defendants' Motion to Dismiss (Docket No. 12) was filed herein on March 17, 2008.

Separate opposition to the Motion to Dismiss (Docket Nos. 22 and 23, respectively) were filed
by plaintiff Love & Money, LLC ("OPM") and Chinois, LLC ("Chinois") (on July 7, 2008. An

MOTION FOR ORDER EXTENDING PAGE LIMIT

Page 2 of 3

1 Opposition to the Motion to Dismiss. The current deadline for Defendants to file replies to both
2 oppositions is Monday, July 28, 2008 (*see* Docket No. 28).

3 Instead of filing separate replies to each opposition, Defendants desire to file one reply to
4 both. However, the current draft of that reply exceeds the 20-page limit imposed by LR 7-4.
5 While this page limit requirement could be met if Defendants filed a separate reply to each
6 opposition, it is more expedient and makes more sense to file a single reply to both oppositions,
7 which requires an extension of the page limit of not to exceed 10 pages.
8

9 **CONCLUSION**

10 For the foregoing reasons, Defendants respectfully request an extension of the LR 7-4
11 page limit for its Reply in Support of Motion Dismiss by not to exceed 10 pages, from 20 pages
12 to 30 pages.
13

14 Attached hereto is a proposed order granting this motion.

15 DATED this 25th day of July 2008.

16 LIONEL SAWYER & COLLINS

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LLC, FORUM DEVELOPERS LIMITED
PARTNERSHIP, SIMON PROPERTY
GROUP LIMITED PARTNERSHIP, AND
SIMON PROPERTY GROUP, INC.

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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FORUM SHOPS, LLC, FORUM
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SIMON PROPERTY GROUP LIMITED
PARTNERSHIP, SIMON PROPERTY
GROUP, INC., CAESARS PALACE CORP.,
and CAESARS PALACE REALTY CORP.

Defendants.

Case No. 2:08-cv-00162-JCM-GWF

[PROPOSED]

**ORDER GRANTING MOTION FOR
ORDER EXTENDING PAGE LIMIT FOR
REPLY IN SUPPORT OF MOTION TO
DISMISS FROM 20 PAGES TO 30 PAGES**

GOOD CAUSE APPEARING, the Motion for Order Extending Page Limit for Reply in Support of Motion to Dismiss from 20 pages to 30 Pages filed by defendants FORUM SHOPS, LLC, FORUM DEVELOPERS LIMITED PARTNERSHIP, SIMON PROPERTY GROUP LIMITED PARTNERSHIP and SIMON PROPERTY GROUP, INC. ("Defendants") is granted.

IT IS HEREBY ORDERED that the page limit for Defendants' Reply in Support of Motion to Dismiss shall be extended by not to exceed 10 pages, from 20 pages to 30 pages.

DATED this ____ day of July 2008.

UNITED STATES DISTRICT JUDGE