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Kathryn Bass, and Joseph Morgan
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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 GABRIELLE CLARK; and WILLIAM CLARK,

CASE NO.: 2:20-cv-02324-APG-VCF

13 Plaintiffs,

14 vs.

15 DEMOCRACY PREP PUBLIC SCHOOLS, Inc.;
 and DEMOCRACY PREP NEVADA LLC; and
 16 DEMOCRACY PREP AGASSI CAMPUS; and
 NATASHA TRIVERS, in her capacity as CEO of
 17 Democracy Prep Public Schools, Inc.; and
 KIMBERLY WALL, in her capacity as assistant
 18 superintendent of Democracy Prep Public
 Schools, Inc.; and ADAM JOHNSON, in his
 19 capacity as executive director of Democracy Prep
 Agassi Campus; and KATHRYN BASS, in her
 20 capacity as a teacher at Democracy Prep Agassi
 Campus; and JOSEPH MORGAN, in his capacity
 21 as president of Democracy Prep Agassi Campus;
 and REBECCA FEINEN, in her capacity as the
 22 Executive Director of the State Public Charter
 School Authority; and MELISSA MACKEDON
 23 (chair), RANDY KIRNER (vice chair), SHELIA
 MOULTON, SAMI RANDOLPH, MALLORY
 24 CYR, TONIA HOLMES-SUTTON, DON
 SOIFER, TAMIKA SHAUNTEE ROSALES,
 25 LEE FARRIS, in their capacities as members of
 the State Public Charter School Authority,

26 Defendants.
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**DEMOCRACY PREP DEFENDANTS'
 MOTION TO EXCEED PAGE LIMITS FOR
 THEIR REPLY BRIEF**

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Democracy Prep Public Schools, Inc., Democracy Prep Nevada LLC, Democracy Prep Agassi Campus, Natasha Trivers, Kimberly Wall, Adam Johnson, Kathryn Bass, and Joseph Morgan (“Defendants”) by and through their attorneys of record, the law firm of GREENBERG TRAURIG, LLP, hereby move to exceed the 12-page limit set by Local Rule 7-3(b) by 3 additional pages (for a total of fifteen (15) pages) for reply brief for the Motion to Dismiss, which is due on July 30, 2021.

Good cause exists to exceed the page limits because Defendants cannot adequately or fully respond to Plaintiffs’ 12 separate causes of action in Plaintiffs’ First Amended Complaint and the 28-page opposition brief without exceeding the page limits set forth in Local Rule 7-3(b). In addition, there is good cause because the Court has enlarged the page limit for the opening and response briefs. Moreover, the reply will be submitted on behalf of eight different Defendants: three corporate defendants and five individual defendants, and there are distinct arguments for each group. Finally, good cause is present because this matter involves complex issues involving constitutional law and government immunities. Plaintiffs consent to this request.

Accordingly, for the foregoing reasons, it is respectfully requested that Defendants’ motion be granted and they be permitted to file a reply brief not to exceed 15 pages.

DATED this 16th day of July, 2021.

GREENBERG TRAURIG, LLP

/s/ Kara B. Hendricks

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*Attorneys for Democracy Prep Public Schools, Inc.,
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Agassi Campus, Natasha Trivers, Kimberly Wall,
Adam Johnson, Kathryn Bass, and Joseph Morgan*

IT IS SO ORDERED:

Dated: July 16, 2021

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ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE