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Campus, Natasha Trivers, Kimberly Wall, Adam Johnson,
Kathryn Bass, and Joseph Morgan*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GABRIELLE CLARK; and WILLIAM CLARK,

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

Plaintiffs,

VS.

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

Defendants.

DEMOCRACY PREP DEFENDANTS' MOTION TO EXCEED PAGE LIMITS FOR THEIR REPLY BRIEF

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

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

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

16 DATED this 16th day of July, 2021.

17 **GREENBERG TRAURIG, LLP**

18 /s/ Kara B. Hendricks
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26 *Attorneys for Democracy Prep Public Schools, Inc.,
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Agassi Campus, Natasha Trivers, Kimberly Wall,
Adam Johnson, Kathryn Bass, and Joseph Morgan*

27 IT IS SO ORDERED:
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Dated: July 16, 2021

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ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE