


Kevin H. Sharp

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

**JEFFREY J. ZANDER, individually and)
as Trustee of the CARDINAL TRUST)
under Agreement dated February 11,)
2009, and JJZ INSURANCE AGENCY,)
a Tennessee general partnership d/b/a)
ZANDER INSURANCE GROUP,)**

No. 3:12-cv-00967

Plaintiffs,

v.

**KATZ, SAPPER & MILLER, LLP;)
KSM BUSINESS SERVICES, INC., and)
ANDREW J. MANCHIR,)**

Defendants.

PLAINTIFFS' MOTION FOR LEAVE TO FILE RESPONSE IN EXCESS OF 25 PAGES

Plaintiffs request leave to file a single memorandum, 35 pages in length, in response to three separate and interlocking post-trial Motions filed by Defendants. In support of this Motion, Plaintiffs state as follows:

1. On August 12, 2014, Defendants filed three separate post-trial motions, supported by three separate memoranda of law. Two of those Memoranda were 25 pages (see Dkts. 250-1 and 251-1), while the third (Dkt. 249-1) provided an additional 13 pages of legal argument for a total of 63 pages.

2. As is shown in the Response to Defendants' Post-Trial Motions (Dkt. 264), Defendants' Motions overlap and are best and most efficiently analyzed as a single Motion seeking alternative relief under Rules 50 and 59. Such an omnibus response will save time and enhance the ease of analyzing the post-trial motions.