

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

LOUIS GOHMERT, TYLER BOWYER, NANCY
COTTLE, JAKE HOFFMAN, ANTHONY KERN,
JAMES R. LAMON, SAM MOORHEAD,
ROBERT MONTGOMERY, LORAINÉ
PELLEGRINO, GREG SAFSTEN, KELLI WARD
and MICHAEL WARD,

Plaintiffs,

v.

THE HONORABLE MICHAEL R. PENCE, VICE
PRESIDENT OF THE UNITED STATES, in his
official capacity.

Defendant.

Civil Action No. 6:20-cv-00660-JDK

(ELECTION MATTER)

**PLAINTIFFS' UNOPPOSED MOTION TO EXCEED PAGE
LIMITS FOR PLAINTIFFS' RESPONSE DEFENDANT'S AND
INTERVENORS' BRIEFS IN OPPOSITION**

Come now the Plaintiffs, U.S. Rep. Louie Gohmert (TX-1), Tyler Bowyer, Nancy Cottle, Jake Hoffman, Anthony Kern, James R. Lamon, Sam Moorhead, Robert Montgomery, Lorainé Pellegrino, Greg Safsten, Kelli Ward, and Michael Ward, by and through their undersigned counsel. Plaintiffs request that this Court allow Plaintiffs to file a brief in response to the briefs to be filed by the Defendant and any Intervenors and *amicus curiae* briefs in opposition to Plaintiffs' Emergency Motion for Expedited Declaratory Judgment and Emergency Injunctive Relief that exceeds the 10-page limit established by L.R. CV-7.1(a)(1) for good cause shown in light of the important nature of this elections case and the constitutional issues raised therein. In support thereof, Plaintiffs state:

1. Defendant's and Intervenors' responses, motions and briefs are 64 pages in length.

2. The legal issues raised in the Defendant's, Intervenors, and *Amicus Curiae* responses are numerous and distinct and require the discussion of multiple factors, along with an application of the complex Constitutional, substantive, and procedural law to the undisputed facts in this case. Plaintiffs require additional pages to adequately respond to these arguments.

3. Plaintiffs request permission to file a brief of fifty (50) pages.

WHEREFORE, due to the important nature of this case and the legal questions presented, Plaintiffs' request to extend the page length to fifty (50) pages is warranted and reasonable in this case.

Dated: December 31, 2020

Respectfully submitted,

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COUNSEL FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

I certify that as counsel for Plaintiffs, I have complied with the meet and confer requirement in Local Rule CV-7(h) in the following respects: I have personally contacted and spoken with Mr. John Coghlan, Deputy Assistant Attorney General from the Civil Division of the United States Department of Justice in Washington, D.C. whom I understand has authority to respond for Defendant Pence. Mr. Coghlan and I briefly discussed the substance of Plaintiffs' request and was told that Defendant does not oppose the motion.

Dated: December 31, 2020



William Lewis Sessions
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on the date specified below, I electronically filed the foregoing motion (together with its accompanying proposed order) with the Clerk of the Court using the CM/ECF system and caused persons who have appeared of record and the following persons to be served by electronic mail as follows:

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Dated: December 31, 2020


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