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(\* Pro hac vice motion pending)  
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**UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF UTAH  
 CENTRAL DIVISION**

Utah Coalition of La Raza, et al.,

Plaintiffs,

v.

Governor Gary Herbert and Attorney General  
 Mark Shurtleff,

Defendants.

**PLAINTIFFS' MOTION FOR LEAVE  
 TO FILE AN OVER LENGTH  
 MEMORANDUM IN SUPPORT OF  
 PLAINTIFFS' MOTION FOR  
 PRELIMINARY INJUNCTION**

Case No. 2:11-cv-00401-BCW

Judge: Brooke C. Wells

Pursuant to DUCiv R 7-1(e), Plaintiffs, by and through counsel, respectfully move the Court for leave to file an over length Memorandum of Points and Authorities (“Memorandum”) in support of Plaintiffs’ Motion for Preliminary Injunction. Plaintiffs anticipate that they will file their Motion for Preliminary Injunction within the next two days, i.e., on or before May 6, 2011.

Plaintiffs are unable to comply with the 25-page limit set forth in DUCiv R 7-1(b)(3)(a) because: (i) Plaintiffs challenge on myriad grounds the unconstitutionality of Utah’s expansive new state immigration system, as established in HB 497 (signed by Utah Governor Gary Herbert on March 15, 2011); (ii) Plaintiffs’ Memorandum addresses the many ways in which HB 497 violates the Supremacy Clause of the United States Constitution, the Fourth Amendment right to be free from unreasonable searches and seizures, and the Right to Travel; and (iii) Plaintiffs’ Memorandum demonstrates that the harms that would result to Plaintiffs (which include seven organizations and six individuals) and others if HB 497 were allowed to go into effect are so substantial and irreparable that the Court should preliminarily enjoin its enforcement.

Although Plaintiffs have attempted to address all of these issues within the standard 25-page limit, they have been unable to do so.

Plaintiffs’ Memorandum is 40 pages long.

Dated: May 4, 2011

Respectfully submitted,

/s/ Darcy M. Goddard  
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