

**UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF ALABAMA
 SOUTHERN DIVISION**

LAQUISHA CHANDLER, et al.,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	Case No.: 2:21-cv-1531-AMM
)	
WES ALLEN, et al.,)	THREE-JUDGE COURT
)	
<i>Defendants.</i>)	
)	

**PLAINTIFFS’ UNOPPOSED MOTION TO EXCEED PAGE LIMITATION
 FOR OPPOSITION TO DEFENDANTS’ MOTIONS TO DISMISS**

Plaintiffs respectfully request the Court grant leave to exceed the page limitation in connection with Plaintiffs’ filing of its Opposition to Defendants’ Motions to Dismiss. Plaintiffs seek leave to file an Opposition brief of no more than forty-five (45) pages. This motion is unopposed.

Defendant Wes Allen and Defendants Rep. Pringle and Sen. Livingston each filed a Motion to Dismiss in this matter. See ECF No. 92 (Defendant Allen’s Motion to Dismiss); ECF No. 93 (Rep. Pringle and Sen. Livingston’s Motion to Dismiss). Plaintiffs seek leave to exceed the standard page limitation in order to respond to both Motions in one consolidated response, in accordance with the Court’s request. See ECF No. 94. These adjustments will work to preserve the resources of Plaintiffs,

and will simplify the review process for both the Court and opposing counsel. Plaintiffs' combined response would not exceed 45 pages, the combined length of Defendants' briefs.

Counsel for Plaintiffs have conferred via email with Jim Davis, Counsel for Defendant Wes Allen, and with Dorman Walker, Counsel for Rep. Pringle and Sen. Livingston, and both have indicated that Defendants do not oppose this request.

Plaintiffs respectfully request that this Court grant their Motion to Exceed the Page Limitation for Opposition to Defendants' Motions to Dismiss and allow them to file a brief of no more than 45 pages in length.

Respectfully submitted,
Dated: September 22, 2023

/s/ Deuel Ross

Deuel Ross*
NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC. 700
14th Street N.W. Ste. 600
Washington, DC 20005
(202) 682-1300
dross@naacpldf.org

Leah Aden*
Stuart Naifeh*
Brittany Carter*
Kathryn Sadasivan^ (ASB-517-E48T)
NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC.
40 Rector Street, 5th Floor
New York, NY 10006
(212) 965-2200
laden@naacpldf.org
snaifeh@naacpldf.org
bcarter@naacpldf.org
ksadasivan@naacpldf.org

/s/ Davin M. Rosborough

Davin M. Rosborough*
Julie A. Ebenstein*
Dayton Campbell-Harris*
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
125 Broad St.
New York, NY 10004
(212) 549-2500
drosborough@aclu.org
jebenstein@aclu.org
dcampbell-harris@aclu.org

/s/ Jack Genberg

Jack Genberg*
Jess Unger*
SOUTHERN POVERTY LAW
CENTER
P.O. Box 1287
Decatur, GA 30031

(404)-708-0554
jack.genberg@splcenter.org
jess.unger@splcenter.org

Shelita M. Stewart*
Jessica L. Ellsworth*
HOGAN LOVELLS US LLP
555 Thirteenth Street, NW
Washington, D.C. 20004
(202) 637-5600
shelita.stewart@hoganlovells.com
jessica.ellsworth@hoganlovells.com

David Dunn*
HOGAN LOVELLS US LLP
390 Madison Avenue
New York, NY 10017
(212) 918-3000
david.dunn@hoganlovells.com

Michael Turrill*
Harmony A. Gbe*
HOGAN LOVELLS US LLP
1999 Avenue of the Stars
Los Angeles, CA 90067
michael.turrill@hoganlovells.com
harmony.gbe@hoganlovells.com

/s/ Sidney M. Jackson

Sidney M. Jackson (ASB-1462-K40W)
Nicki Lawsen (ASB-2602-C00K)
WIGGINS CHILDS PANTAZIS
FISHER & GOLDFARB, LLC
301 19th Street North
Birmingham, AL 35203
Phone: (205) 341-0498
sjackson@wigginschilds.com
nlawsen@wigginschilds.com

Attorneys for Plaintiffs

* Admitted *Pro hac vice*

^ Request for admission to the Northern
District of Alabama forthcoming

CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed a copy of the foregoing with the Clerk of Court using the CM/ECF system which provides electronic notice of filing to all counsel of record.

This the 22nd day of September 2023.
/s/ Dayton Harris-Campbell