

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

COAKLEY PENDERGRASS; TRIANA
ARNOLD JAMES; ELLIOTT
HENNINGTON; ROBERT RICHARDS;
JENS RUECKERT; and OJUAN GLAZE,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his official
capacity as the Georgia Secretary of State;
WILLIAM S. DUFFEY, JR., in his official
capacity as chair of the State Election
Board; MATTHEW MASHBURN, in his
official capacity as a member of the State
Election Board; SARA TINDALL
GHAZAL, in her official capacity as a
member of the State Election Board;
EDWARD LINDSEY, in his official
capacity as a member of the State Election
Board; and JANICE W. JOHNSTON, in
her official capacity as a member of the
State Election Board,

Defendants.

CIVIL ACTION FILE
NO. 1:21-CV-05339-SCJ

**PLAINTIFFS' CONSENT MOTION FOR LEAVE TO FILE
EXCESS PAGES**

Pursuant to Section III.C of this Court's standing order, Plaintiffs COAKLEY
PENDERGRASS, TRIANA ARNOLD JAMES, ELLIOTT HENNINGTON,

ROBERT RICHARDS, JENS RUECKERT, and OJUAN GLAZE respectfully move the Court for leave to file a brief in support of their motion for summary judgment that exceeds the Court's page limits under LR 7.1(D), NDGa.

Plaintiffs will move for summary judgment on their claim against Georgia's enacted congressional map, which is brought under Section 2 of the Voting Rights Act of 1965, 52 U.S.C. § 10301. The brief in support of their motion will incorporate testimony from four experts and extensive factual and legal analysis relating to the merits of their Section 2 claim. Motions practice in election- and redistricting-related cases often requires briefing that exceeds the limits of LR 7.1(D), NDGa. *See, e.g., Grant v. Raffensperger*, slip op. at 1–2, No. 1:22-cv-0122-SCJ (N.D. Ga. Jan. 12, 2022), Doc. No. 12 (granting request to file 35-page brief in support of preliminary injunction motion); *Fair Fight Action v. Raffensperger*, No. 1:18-cv-05391-SCJ (N.D. Ga. June 23, 2020) (granting request to file two briefs totaling 85 pages in support of summary judgment motions); *see also Ga. State Conf. of NAACP v. Fayette Cnty. Bd. of Comm'rs*, 775 F.3d 1336, 1343 (11th Cir. 2015) (emphasizing importance of detailed factual findings and legal conclusions in Section 2 vote-dilution cases). Accordingly, Plaintiffs respectfully request an additional fifteen (15) pages—for a total of forty (40) pages—for their forthcoming brief in support of summary judgment.

Counsel for Plaintiffs have contacted counsel for Defendants regarding this motion, and Defendants have consented to the 15-page addition.

A proposed order is attached for the Court's convenience.

Dated: March 13, 2023

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Respectfully submitted,

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Counsel for Plaintiffs

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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing *Plaintiffs' Consent Motion for Leave to File Excess Pages* has been prepared in accordance with the font type and margin requirements of LR 5.1, NDGa, using font type of Times New Roman and a point size of 14.

Dated: March 13, 2023

Adam M. Sparks
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I have on this date caused to be electronically filed a copy of the foregoing *Plaintiffs' Consent Motion for Leave to File Excess Pages* with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to counsel of record.

Dated: March 13, 2023

Adam M. Sparks
Counsel for Plaintiffs

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**PROPOSED ORDER GRANTING PLAINTIFFS' CONSENT
MOTION FOR LEAVE TO FILE EXCESS PAGES**

This Court has considered Plaintiffs' consent motion for leave to file excess pages in support of their motion for summary judgment (Doc. No. __) and finds that

Plaintiffs have established good cause to file an additional fifteen (15) pages.

Plaintiffs' motion is therefore **GRANTED**.

Plaintiffs may file an additional fifteen (15) pages, for a total of forty (40) pages, for the brief in support of their forthcoming motion for summary judgment.

IT IS SO ORDERED, this _____ day of _____, 2023.

HONORABLE STEVE C. JONES
UNITED STATES DISTRICT JUDGE