

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 9:08-80736-Civ-Marra/Johnson

JANE DOE #1 and JANE DOE #2

v.

UNITED STATES
_____ /

**UNOPPOSED MOTION OF JANE DOE 1 AND 2 TO EXCEED PAGE LIMITS IN
THEIR REPLY IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT**

COME NOW Jane Doe 1 and Jane Doe 2 (hereinafter “the victims”), by and through undersigned counsel, to file this unopposed motion for leave to file a 32-page reply in support of their motion for summary judgment.

As the Court is aware, this is a complex, long-running case, involving important and precedent setting issues concerning the Crime Victims’ Rights Act. Because of the complexity of the case, the Court granted the victims leave to file a single, sixty-page motion for summary judgment, which included 157 separate assertions of material fact. DE 361 at 8-47. In response, the Government has filed three separate documents: First, the Government has filed a twenty-page Response to Petitioners’ Statement of Undisputed Material Facts in Support of Petitioners’ Motion for Partial Summary Judgment, DE 407; second, the Government has filed its own 8-page Statement of Undisputed Material Facts in Support of Cross-Motion for Summary Judgment, DE 402; and third, the Government filed a 30-page Response and Opposition to Petitioners’ Motion for Partial Summary Judgment and Cross-Motion for Summary Judgment, DE 401-2. These three documents total 58 pages and raise ten separately-enumerated and argued

reasons why the Court should, in the Government's view, grant summary judgment on all of the victims' claims and, correspondingly, deny the victims motion for summary judgment.

S.D.Fla. L.R. 7.1(c)(2) provides that a reply memorandum of law shall not exceed ten (10) pages, absent prior permission of the Court. The victims accordingly seek permission from the Court to file an xx-page reply. Victims' counsel have worked diligently to keep their response as short as possible. But each of the Government's arguments presents complicated issues requiring a careful response. Of course, if the Court were to grant summary judgment in this case, that would lead to significant conservation of judicial resources. Accordingly, full and careful briefing at this critical juncture is appropriate.

Moreover, approximately half of the reply memorandum is nothing more than a distillation of what facts are now disputed, which involves a distillation of the competing factual presentations of the Government and the victims. The Victims respectfully submit that it will be useful to the Court to have a single collection of the relevant undisputed facts in one single document for the Court's review and use.

Victims' counsel have conferred with respondent's counsel, and they graciously do not oppose the motion.

WHEREFORE, the victims respectfully request leave of the Court to file a 32-page reply in support of their motion for summary judgment. A proposed order is attached.

DATED: August 11, 2017

Respectfully Submitted,

/s/ Bradley J. Edwards
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CERTIFICATE OF SERVICE

I certify that the foregoing document was served on August 11, 2017, on the following
using the Court's CM/ECF system:

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