

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 08-CV-21243-ALTONAGA/Brown

_____	:
League of Women Voters of Florida, et al.,	:
	:
Plaintiffs,	:
	:
vs.	:
	:
Kurt S. Browning, in his official capacity,	:
and Donald L. Palmer, in his official capacity,	:
	:
Defendants.	:
_____	:

**PLAINTIFFS’ RENEWED MOTION FOR LEAVE  
TO FILE BRIEF IN SUPPORT OF THEIR MOTION FOR  
PRELIMINARY INJUNCTION IN EXCESS OF TWENTY PAGES**

Plaintiffs League of Women Voters of Florida, Florida AFL-CIO, as organizations and as representatives of their members, and Marilyn Wills hereby renew their motion to this Court, pursuant to S.D. Fla. L.R. 7.1(C)(2), for permission to exceed the page limitation applicable to Plaintiffs’ Motion for Preliminary Injunction. As good cause for granting the motion, Plaintiffs submit as follows:

1. On May 14, 2008, Plaintiffs filed a motion for leave to file the brief in support of their motion for preliminary injunction in excess of twenty pages. [D.E. 23] The proposed motion for preliminary injunction—twenty-six pages in length—was filed on May 14, 2008. [D.E. 24] Today, on May 15, 2008, this Court denied Plaintiffs motion without prejudice for failure of Plaintiffs’ counsel to certify that they had conferred with opposing counsel regarding the motion pursuant to S.D. Fla. L.R. 7.1(A)(3). [D.E. 27]

2. Renée Paradis, one of the attorneys for the Plaintiffs, conferred with Allen Winsor, one of the attorneys for the Defendants, to secure consent to the Plaintiffs' motion to file a brief that was 26 pages long. Mr. Winsor declined to give such consent. The details of this conversation are related in the Certification of Renée Paradis filed with this motion.

3. Plaintiffs' motion for preliminary injunction addresses complex issues of federal constitutional law arising under the First and Fourteenth Amendments. Notwithstanding the Defendants failure to consent to Plaintiffs' motion, Plaintiffs' proposed brief in excess of the twenty-page limit set by Rule 7.1(C)(2) is necessary in order to adequately develop the basis for their requested relief, and assist the Court in resolving the involved issues presented in this action.

4. A proposed order is annexed hereto for the convenience of the Court.

WHEREFORE, Plaintiffs respectfully request that the Court enter an Order, in substantially the same form as the proposed Order annexed hereto, granting Plaintiffs permission to file their memorandum in excess of the applicable page limitations and accepting the proposed motion for preliminary injunction [D.E. 24].

Dated: May 15, 2008

Respectfully submitted,

s/Gary C. Rosen

Gary C. Rosen, Esq.  
BECKER & POLIAKOFF, P.A.  
3111 Stirling Road  
Ft. Lauderdale, Florida 33312  
Telephone: (954) 985-4133  
Florida Bar No. 310107

*Attorneys for Plaintiffs*

**OF COUNSEL**

Wendy R. Weiser\*  
Renée Paradis\*  
BRENNAN CENTER FOR JUSTICE AT  
NYU SCHOOL OF LAW  
161 Avenue of the Americas, 12th Floor  
New York, New York 10013  
Telephone: (212) 998-6730

Elizabeth S. Westfall  
ADVANCEMENT PROJECT  
1730 M. Street, N.W., Suite 910  
Washington, D.C. 20036  
Telephone: (202) 728-9557

James E. Johnson  
S.G. Dick\*  
Derek Tarson\*  
Jessica Simonoff\*  
Corey Whiting\*  
Courtney Dankworth\*  
DEBEVOISE & PLIMPTON LLP  
919 Third Avenue  
New York, New York 10022  
Telephone: (212) 909-6000  
Facsimile: (212) 909-6836  
*Of Counsel for Plaintiff League of Women  
Voters of Florida*

\* Admitted *pro hac vice* in this action.