IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

Ravago, et al.,

Plaintiffs,

v.

Case No. 1:22-cv-00745

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Lightfoot, et al.,

Defendants.

Plaintiffs' Motion to Exceed Page Limit

Plaintiffs by and through their undersigned Counsel, file this Motion to Exceed the Page Limitation of Local Rule 7.1, seeking to file a Memorandum of Law in support of their Motion for Preliminary Injunction of up to 25 pages. In support of this motion, Plaintiffs state the following:

- 1. Plaintiffs are concurrently filing a Motion for Preliminary Injunction.
- 2. Local Rule 7.1 limits briefs such as the Memorandum in Support of Plaintiffs' Motion for Preliminary Injunction to 15 pages.
- District court judges may waive Local Rule 7.1 in their discretion. See, e.g., *Pfefferkorn v. Primesource Health Grp.*, *LLC*, No. 17-cv-1223, 2019 U.S. Dist. LEXIS 14168, at *11 (N.D. Ill. Jan. 29, 2019).
- 4. Plaintiffs believe the issues raised by the Preliminary Injunction require a thorough discussion, which cannot be properly accomplished in 15 pages.
- 5. Plaintiffs' suit brings facial challenges to two related orders by two different public health agencies—Cook County and the City of Chicago—and while the two orders are similar, properly addressing each in a single document

requires more than 15 pages.

- 6. Moreover, Plaintiffs' challenge to Defendants' orders addresses multiple topics, including the constitutionality of the orders, their infringement of religious liberty, and their consistency with the governing statutes and ordinances. Covering each of these relevant topics effectively requires more than 15 total pages.
- 7. Plaintiffs believe that under these circumstances, it would be in the interests of the parties and this Court to allow the Motion to exceed the usual length limitation, up to a maximum of 25 pages total.
- 8. Plaintiffs will not oppose any motion by Defendants for similar space to respond in their briefing.
- 9. Plaintiffs have consulted Counsel for the City of Chicago Defendants, and they do not oppose this motion. Plaintiffs have attempted to contact Counsel for the Cook County Defendants by phone and email, but have not been able to do so yet.

10. Plaintiffs waive any right to a hearing unless the Court desires one.

WHEREFORE, Plaintiffs respectfully request the Court to enter an Order granting Plaintiffs leave to exceed the page limit specified in Local Rule 7.1, and ordering that said Brief in Support of their Motion for Preliminary Injunction will not exceed 25 pages. Dated: February 18, 2022

Respectfully Submitted,

/s/ Daniel R. Suhr

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CERTIFICATE OF SERVICE

I, Daniel Suhr, an attorney, hereby certify that on February 18, 2022, I directed that the City Defendants and the County Defendants be served in accordance with F.R.C.P. 4 & 5.

<u>/s/ Daniel Suhr</u>