

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:15-cv-00281-WJM-KMT

ABBY LANDOW,  
JEFFREY ALAN,  
SUSAN WYMER,  
LAWRENCE BEAL,

individually and on behalf of  
others similarly situated,

GREENPEACE, INC.,  
NANCY YORK,

Plaintiffs,

v.

CITY OF FORT COLLINS,

Defendant.

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**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMITS  
RELATED TO THEIR REPLY IN SUPPORT OF THEIR MOTION FOR TEMPORARY  
RESTRAINING ORDER AND FOR PRELIMINARY INJUNCTION**

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Plaintiffs, through their undersigned attorneys, hereby submit their unopposed motion to exceed the page limit for their reply to Defendant's Response to Motion for Temporary Restraining Order and for Preliminary Injunction, and as grounds therefor state as follows:

1. Pursuant to D.C.Colo.L.Civ.R. 7.1(a), counsel for Plaintiffs discussed this motion with Heidi Hugdahl, counsel for Defendant. Ms. Hugdahl stated she had no objection to the relief requested herein.

2. On February 10, 2015, Plaintiffs filed their Motion for Temporary Restraining Order and Preliminary Injunction ["Motion"] consisting of 35 pages [Dkt. 2].

3. On February 13, 2015, Defendant filed their motion for leave to exceed page limits, requesting 30 pages to respond to Plaintiffs' Motion [Dkt. 13], which was granted on February 17, 2015 [Dkt. 14]. On February 18, 2015, Defendant timely filed their 30-page Response to Motion for Temporary Restraining Order and for Preliminary Injunction ["Response"] [Dkt. 16].

4. Pursuant to WJM Revised Practice Standard(C)(1), "any reply brief shall not exceed 10 pages". "Exceptions to the above page limitations will be made only in exceptional circumstances where I decide that the complexity or numerosity of the issues compel a motion, brief, objection, or response of greater length." *Id.*, Section (C)(3).

5. This case presents such extraordinary circumstances. Plaintiffs' Motion addresses a number of constitutional arguments and First Amendment issues, as well as challenges to the Ordinance at issue. Plaintiffs recognize that these arguments and issues have been somewhat briefed in the Motion and Response previously filed, but Plaintiffs believe that additional pages beyond the 10 pages allotted will be necessary to thoroughly address the arguments raised in Defendant's Response.

WHEREFORE, based on the foregoing, Plaintiffs respectfully request leave to exceed this Court's Practice Standards related to page numbers and to file their reply not to exceed 15 pages.

Dated: February 20, 2015

Respectfully submitted,

/s/ Hugh Q. Gottschalk

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*Attorneys for Plaintiffs Abby Landow, Jeffrey  
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**CERTIFICATE OF SERVICE (CM/ECF)**

I hereby certify that on February 20, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of the same via email to the following:

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