

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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ROBERT DRAPER, et al.)	
)	
Plaintiffs,)	
)	
v.)	1:14-CV-12471-NMG
)	
MARTHA COAKLEY, in her official capacity as)	
ATTORNEY GENERAL OF MASSACHUSETTS)	
)	
Defendant.)	
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**DEFENDANT’S ASSENTED-TO MOTION FOR
LEAVE TO FILE A MEMORANDUM IN EXCESS OF TWENTY PAGES**

Pursuant to Local Rule 7.1(b)(4), the Attorney General seeks leave of Court to file a memorandum of law in excess of 20 pages in support of its motion to dismiss. The Attorney General requests 5 additional pages due to the importance and complexity of the issues underlying the motion. Cf. Turner v. Fallon Community Health Plan, Inc., 953 F. Supp. 419, 421-422 (D. Mass. 1997) (permitting memoranda in excess of 20 pages where the case involved a highly technical subject matter).

In particular, the Attorney General raises several grounds for dismissal in the motion presented herewith, some of which involve multipart Constitutional analyses. In order to raise and address each ground within the appropriate legal framework and despite the Attorney General’s best efforts to keep the arguments as short as possible, additional space was required.

The Attorney General has contacted counsel for Plaintiffs regarding this request, and counsel for Plaintiffs has courteously assented to this motion for leave to file a memorandum in excess of 20 pages.

MARTHA COAKLEY
ATTORNEY GENERAL

/s/ Glenn Kaplan
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Dated: August 22, 2014

LOCAL RULE 7.1(a)(2) CERTIFICATION

I hereby certify that I conferred with counsel for Plaintiffs via an exchange of emails on August 21, 2014 and that he courteously assented to this motion.

/s/ Glenn Kaplan
Glenn Kaplan, BBO# 567308
Assistant Attorney General

CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the Electronic Case Filing (ECF) system and thus copies will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF); paper copies will be sent to those indicated on the NEF as non registered participants on or before August 22, 2014.

/s/ Glenn Kaplan
Glenn Kaplan, BBO# 567308
Assistant Attorney General