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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

- 4 **(1) ROBERT DRAPER;**
5 **(2) ARIEL WEISBERG;**
6 **(3) DONNA MAJOR;**
7 **(4) ERIC NOTKIN;**
8 **(5) ROBERT BOUDRIE;**
9 **(6) BRENT CARLTON,**
10 *collectively, the*
11 **"CONSUMER PLAINTIFFS", and**
12 **(7) CONCORD ARMORY, LLC;**
13 **(8) PRECISION POINT FIREARMS, LLC;**
14 *collectively, the*
15 **"DEALER PLAINTIFFS", and**
16 **(9) SECOND AMENDMENT**
17 **FOUNDATION, INC.,**
18 **(10) COMMONWEALTH SECOND**
19 **AMENDMENT, INC.**
20 *collectively, the*
21 **"ORGANIZATIONS", and**

Plaintiffs

v.

23 **MARTHA COAKLEY,**
24 *in her official capacity as*
25 **ATTORNEY GENERAL OF**
26 **MASSACHUSETTS**

Defendant

Civil Action No.
1:14-CV-12471-NMG

PLAINTIFFS' ASSENTED-TO
MOTION FOR LEAVE TO
FILE AN OPPOSITION
MEMORANDUM IN EXCESS
OF 20 PAGES

PLAINTIFFS' ASSENTED-TO MOTION FOR LEAVE TO
FILE AN OPPOSITION MEMORANDUM IN EXCESS OF 20 PAGES

1 The CONSUMER PLAINTIFFS, DEALER PLAINTIFFS and ORGANIZATIONS (collectively
2 hereafter "PLAINTIFFS"), by and through their attorney of record, hereby move this Honorable
3 Court pursuant to Local Rule 7.1(b)(4) for leave to file a memorandum of law in excess of 20 pages
4 in support of their Opposition to the defendant ATTORNEY GENERAL's Motion to Dismiss their
5 Complaint (Document No. 9 [22 August 2014]).

6 PLAINTIFFS request five (5) additional pages due to the importance and complexity of the
7 issues underlying the motion. Cf. Turner v. Fallon Community Health Plan, Inc., 953 F. Supp. 419,
8 421-422 (D. Mass. 1997) (permitting memoranda in excess of 20 pages where the case involved a
9 highly technical subject matter).

10 The defendant ATTORNEY GENERAL's Motion to Dismiss raises several grounds for
11 dismissal of the Complaint, all of which involve multipart Constitutional analyses. Despite the
12 PLAINTIFFS' best efforts to keep the Opposition arguments as short as possible, additional space is
13 likely required to adequately address each of the grounds raised in the defendant ATTORNEY
14 GENERAL's Motion to Dismiss within the appropriate legal framework.

15 PLAINTIFFS' counsel contacted the defendant ATTORNEY GENERAL's counsel regarding this
16 request, and on 12 September 2014 the defendant ATTORNEY GENERAL's counsel courteously
17 assented to this motion for leave to file a memorandum in excess of 20 pages.

18 Respectfully submitted,

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20 Dated: 12 September 2014.

**ROBERT DRAPER; ARIEL WEISBERG; DONNA
MAJOR; ERIC NOTKIN; ROBERTY BOUDRIE;
BRENT CARLTON; CONCORD ARMORY, LLC;
PRECISION POINT ARMORY, LLC; SECOND
AMENDMENT FOUNDATION, INC. and
COMMONWEALTH SECOND AMENDMENT, INC.**

By and through their attorney of record

/s/ Alexander A. Flig

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**PLAINTIFFS' ASSENTED-TO MOTION FOR LEAVE TO
FILE AN OPPOSITION MEMORANDUM IN EXCESS OF 20 PAGES**

