

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
GREENEVILLE

KATERI LYNEE DAHL,]	
]	
Plaintiff,]	
]	
v.]	No. 2:22-cv-00072-KAC-CRW
]	
CHIEF KARL TURNER, and]	
CITY OF JOHNSON CITY, TENNESSEE,]	
]	
Defendants.]	

MOTION OF DEFENDANT, CITY OF JOHNSON CITY, TENNESSEE, FOR PERMISSION TO FILE BRIEF IN EXCESS OF TWENTY-FIVE (25) PAGES

The City of Johnson City, Tennessee (“Johnson City”) seeks permission to file a Memorandum Brief in support of its Motion for Summary Judgment that is twenty-nine (29) pages in length, which is in excess of the twenty-five (25) page limit set forth in Local Rule 7.1(b).

In support of this Motion, undersigned counsel would represent to the Court that the initial draft of the Memorandum Brief was thirty-six (36) pages in length, and counsel spent several hours striking portions of the Brief in order to reduce the Brief to twenty-nine (29) pages.

Because the Court’s dispositive motion deadline expires on January 16, 2024, Johnson City has filed its Memorandum Brief in support of the Motion for Summary Judgment in order to comply with that deadline. However, if this Court finds that this Motion to exceed the page limit is not well-taken, then Johnson City would request that it be given two (2) business days from the date of any Order denying this Motion to file a revised Memorandum Brief that complies with the twenty-five (25) page limit.

Respectfully submitted,

s/K. Erickson Herrin

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