

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

WILL BRADSHAW,

Plaintiff.

Case No. 5:20-cv-01168

Hon.

v.

JOSEPH SALVAGGIO;
KELLY KUENSTLER;
CATHERINE RODRIGUEZ;
DONNA CHARLES;
MONICA ALCOCER.

Defendants.

**PLAINTIFF'S MOTION TO INCREASE PAGE LIMIT FOR HIS EMERGENCY
MOTION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION**

NOW COMES Plaintiff, Councilor Will Bradshaw, by and through counsel, Excolo Law, PLLC, files this motion pursuant to Local Court Rule CV-7(d) respectfully requesting this Court Grant an extension to the page limit for the filing of Plaintiff's Emergency Motion for a Temporary Restraining Order and Preliminary Injunction. In support of his motion, Plaintiff states as follows:

1. Pursuant to Local Court Rule CV-7(d)(3), a non-dispositive motion is limited to 10 pages, unless otherwise authorized by the Court. A motion for preliminary relief is not classified as a dispositive motion under the local rules. *Id.* at (c).

2. Plaintiff's motion for preliminary relief discusses the substantial likelihood of the success on the merits of Plaintiff's claim for a violation of due process and a violation of the First Amendment against Defendants and the irreparable harm to be suffered by Plaintiff, an elected official at risk of being unconstitutionally removed from his position, unless he is granted an order of relief from this Court.
3. In order to effectively address the substantive law as applied to the intricate facts of this case, Plaintiff's motion and memorandum of law totals approximately 17 pages in length.
4. This Court has the discretion to authorize an increase to the page limit. *See* Local Rule CV-7(d)(3); *Franks v. Prudential Health Care Plan*, 164 F. Supp. 2d 865, 869 n.1 (W.D. Tex. 2001) (granting extension); *Harrelson v. United States*, 964 F. Supp. 227, 229 (W.D. Tex. 1997) (same); *Abugalyon v. City of El Paso*, 2005 U.S. Dist. LEXIS 16168, at *23 (W.D. Tex. Aug. 5, 2005) (same).
5. Plaintiff requests this Court exercise its discretion and grant Plaintiff a 7-page extension to the page limit for non-dispositive motions.

WHEREFORE, Plaintiff respectfully requests this Honorable Court grant his motion to increase the page limit for his Emergency Motion for a Temporary Restraining Order and Preliminary Injunction.

Respectfully Submitted,

EXCOLO LAW, PLLC

Dated: October 1, 2020

By: /s/ Solomon M. Radner
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CERTIFICATE OF SERVICE

I hereby affirm that on this 1st day of October, 2020, that the foregoing document was filed with the Court's CM/ECF electronic filing system, and that a copy of said document was served upon all parties of record, via electronic service, as well as personally mailed to Defendants with Plaintiff's Verified Complaint.

/s/ Solomon M. Radner