

**IN THE COURT OF COMMON PLEAS
FOR FRANKLIN COUNTY, OHIO**

PRETERM-CLEVELAND, *et al.*,

Plaintiffs,

v.

DAVE YOST, *et al.*,

Defendants.

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Case No. 24 CV 002634

Judge David C. Young

THE STATE’S MOTION FOR LEAVE TO EXCEED PAGE LIMITATIONS

Defendants Attorney General Dave Yost, Kim G. Rothermel, Harish Kakarala, and Director Bruce T. Vanderhoff (collectively, “State Defendants”) hereby move this Court for leave to file a memorandum that exceeds the fifteen-page limit pursuant to L.R. 12.01. The State seeks to file a Response to Plaintiffs’ Motion for a Preliminary Injunction, which included a memorandum in support of that motion that was 35 pages in length. The State requests to file a memorandum not to exceed 35 pages.

Leave is warranted here for many of the same reasons supporting Plaintiffs’ Motion to Exceed Page Limitations: the novelty and complexity of the legal and factual issues involved in this case and the significant public interests at stake, as well as the need for the State to respond to Plaintiffs’ 35-page memorandum in support of their motion. Additional pages will aid the Court in considering both sides of this conflict by allowing an equal opportunity for the State to fully explicate its opposition before rendering a decision on the necessity of any preliminary relief.

For these reasons, the State respectfully requests that this Court grant its Motion for Leave

to Exceed Page Limitations and instruct the clerk to accept the Memorandum for filing.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify the foregoing was served upon the following via electronic mail this 24th day of April, 2024.

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