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7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE DISTRICT OF ARIZONA**

9 James Oliver Romine Jr.,

No. 2:16-cv-00604-JJT

10 Plaintiff,

**MOTION TO EXCEED PAGE LIMIT ON
DEFENDANT’S MOTION TO DISMISS**

11 vs.

12 James Nicholas Stanton,

13 Defendant.
14
15

16 Defendant James Nicholas Stanton respectfully requests an order permitting Defendant
17 to file a *Motion to Dismiss* [Doc. 12] that exceeds by 4½ pages the 17-page limitation provided
18 by Rule 7.2(e), Local Rules of Civil Procedure.

19 The present proceeding relates to a 10-count complaint for libel filed by Plaintiff James
20 Olive Romine Jr. in his individual capacity. Mr. Romine sees \$10,761,000 in damages.
21 Defendant’s *Motion to Dismiss* provides background on Defendant’s business and the alleged
22 defamatory statements and addresses how Plaintiff does not have standing to sue in his
23 individual capacity for harm suffered by the Arizona limited liability company of which he is a
24 manager, how Mr. Stanton is not subject to personal jurisdiction in Arizona, and how, in any
25 event, none of the alleged statements can be considered libel under applicable law.

26 The highly factual nature of libel claims, and the legal analysis inherent in a motion to
27 dismiss, necessitates the filing of a motion that consists of 22 pages in total, not including the
28 Table of Contents and Table of Authorities. Defendant’s counsel has condensed the factual



1 summary and arguments as much as possible. However, providing the necessary factual
2 background and legal analysis requires more space than would ordinarily be the case.
3 Accordingly, Defendant respectfully requests that the Court authorize the *Motion to Dismiss* to
4 exceed the 17-page limit.

5 A proposed form of Order is submitted herewith. If the Court denies this Motion,
6 Defendant respectfully requests leave to refile the *Motion to Dismiss* either as three separate
7 documents (one addressing each ground for dismissal) or as a further condensed version of the
8 present Motion within the page limits set by local rule.

9 RESPECTFULLY SUBMITTED this 4th day of May, 2016.

10 **HARTMAN TITUS PLC**

11 By: /s/Bradley P. Hartman

12 Bradley P. Hartman
13 John D. Titus
14 7114 E. Stetson Drive, Suite 205
15 Scottsdale, Arizona 85251-3250
16 Attorneys for Defendant

17 **CERTIFICATE OF SERVICE**

18 I hereby certify that on May 4, 2016, I caused the
19 foregoing document to be filed electronically with the
20 Clerk of Court through CM/ECF System for filing and
21 transmittal of Notice to the following CM/ECF registrant:

22 James Oliver Romine Jr.
23 12494 Ironwood Dr.
24 Yuma, AZ 85367
25 jromine2445@gmail.com
26 *Plaintiff*

27 /s/ Bradley P. Hartman
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

James Oliver Romine Jr.,

Plaintiff,

vs.

James Nicholas Stanton,

Defendant.

No. 2:16-cv-00604-JJT

**ORDER GRANTING MOTION TO
EXCEED PAGE LIMIT**

Having reviewed Defendant’s Motion for Leave to Exceed the Page Limit on Defendant’s Motion to Dismiss [Doc. 13], and finding good cause, it is:

ORDERED that Defendant may submit a Motion to Dismiss that is up to twenty-two (22) pages.