

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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JULIA ROSSI, <i>et al.</i> ,))	
))	Case No.: 1:20-cv-5090
Plaintiffs,))	
))	Hon. Andrea R. Wood, presiding
v.))	Hon. Magistrate Heather K. McShain
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CLAIRE’S STORES, INC., <i>et al.</i> ,))	
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Defendants.))	
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PLAINTIFFS’ UNOPPOSED MOTION FOR LEAVE TO FILE AN OVERSIZED BRIEF

NOW COME Plaintiffs, by and through their undersigned attorneys, and pursuant to L.R. 7.1 of the Local Rules of the United States District Court for the Northern District of Illinois, and respectfully move this Court for leave to file an oversized brief of 26 pages (11 pages over the 15-page limit) in support of Plaintiffs’ Unopposed Motion for Final Approval of Class Action Settlement and Certification of Settlement Class. In support thereof, Plaintiffs respectfully state as follows:

1. Local Rule 7.1 authorizes this Court to grant leave to file memoranda in excess of the 15-page limit set forth in the Rule.
2. Though Plaintiffs’ counsel attempted to streamline the memorandum as much as possible, due to the complex legal and factual issues in this matter, Plaintiffs respectfully request

26 pages in order to fully brief the issues involved in the final approval of the settlement of this case.

3. It is in the interest of fairness and judicial economy to grant Plaintiffs leave to file an oversized brief. Doing so will also assist the Court by providing it with a thorough legal analysis of the factors to be assessed for final approval of the settlement of this case. Plaintiffs believe that the additional pages requested will thus facilitate this Court's consideration of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement.

4. Courts in the Seventh Circuit grant leave to file oversized briefs when the circumstances warrant. *See, e.g., Jakubowska v. Lakeside Bldg. Maint.*, No. 97 C 4795, 1997 WL 665747, at *2 n.4 (N.D. Ill. Oct. 16, 1997) ("this Court regularly grants lawyers' motions for relief from that [15 page] limitation"). In one case, the court granted a motion to file a brief of 35 pages. *Garden City Emps.' Ret. Sys. v. Anixter Int'l, Inc.*, No. 09-CV-5641, 2011 WL 1303387, at *9 (N.D. Ill. Mar. 31, 2011). In another, it granted leave to file a memorandum of 60 pages. *Frantz v. U.S. Powerlifting Fed'n*, No. 85 C 6132, 1988 WL 64049, at *4 n.1 (N.D. Ill. June 13, 1988). Plaintiffs' request for leave to file a memorandum of 26 pages is thus well within the range of page limits that courts in this District have previously allowed.

5. Defendants do not oppose Plaintiffs' request for an 11-page extension of the page limits in Local Rule 7.1 for Plaintiffs' brief in support of their Unopposed Motion For Final Approval of Class Action Settlement and Certification of Settlement Class.

WHEREFORE, Plaintiffs respectfully request that this Court grant the motion for leave to file an oversized brief in support of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and Certification of Settlement Class, exclusive of the table of contents, table of authorities, and signature page.

Dated: September 6, 2022

Respectfully submitted,

/s/ Bradley K. King

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Counsel for Plaintiffs and the Settlement Class

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2022, the foregoing Unopposed Motion for Leave to File an Oversized Brief, was electronically filed with the Clerk of the United States District Court for the Northern District of Illinois, using the CM/ECF system, which will send notification of the filing to all attorneys of record.

/s/ Bradley K. King

Bradley K. King