

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

SAMUEL K. LIPARI,)	
)	
Plaintiff,)	
)	
v.)	Case No. 07-CV-00849-FJG
)	
GENERAL ELECTRIC COMPANY, et al.,)	
)	
Defendants.)	

**MOVING DEFENDANTS’ MOTION FOR LEAVE TO FILE REPLY BRIEF IN
EXCESS OF LOCAL RULE PAGE LIMITATION**

Defendants General Electric Company, General Electric Capital Business Asset Funding Corporation, GE Transportation Systems Global Signaling, LLC, Heartland Financial Group, Inc., Christopher McDaniel and Stuart Foster (collectively the “Moving Defendants”) move this Court for leave to file a consolidated reply brief in excess of the page limitations established by local rule. In support of their motion, the Moving Defendants state as follows:

1. The Moving Defendants have previously filed motions to dismiss Plaintiff’s Complaint. *See* Docs. 11, 19, 32.
2. Another defendant in this action, Seyfarth Shaw LLP, also filed a motion to dismiss Plaintiff’s Complaint. *See* Doc. 16.
3. On April 14, 2008, pursuant to the Court’s Order (Doc. 41), Plaintiff filed a 35-page consolidated brief in opposition to the four motions to dismiss referenced above. *See* Doc. 42.

4. Rather than filing three separate reply briefs which would address many of the same issues and arguments, the Moving Defendants seek to file a consolidated brief in reply to Plaintiff's consolidated opposition to all of the pending motions to dismiss.

5. Local Rule 7.1(f) states that "Reply suggestions shall be limited to 10 double-spaced pages, unless otherwise authorized by the Court."

6. The Moving Defendants seek to file a consolidated brief that is twelve (12) pages in length, which would therefore exceed the aforementioned page limitation by two (2) pages. A copy of the Moving Defendants proposed reply brief is attached as Exhibit 1 to this motion.

7. The Moving Defendants believe that judicial economy would be served by filing one consolidated twelve (12) page reply brief, as opposed to filing three (3) separate reply briefs that address many of the same arguments.

WHEREFORE Defendants General Electric Company, General Electric Capital Business Asset Funding Corporation, GE Transportation Systems Global Signaling, LLC, Heartland Financial Group, Inc., Christopher McDaniel and Stuart Foster request that this Court issue an Order allowing them leave to file the attached reply brief.

HUSCH BLACKWELL SANDERS LLP

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was forwarded this 29th day of April, 2008, by first class mail, postage prepaid to:

Samuel K. Lipari
297 NE Bayview
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And an electronic copy was filed via the CM/ECF system which will send a notice of electronic filing to the following:

Nick Badgerow

and

Jeffrey P. Ray

/s/ Michael S. Hargens