

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
KANSAS CITY, MISSOURI**

SAMUEL K. LIPARI)	
(Assignee of Dissolved)	
Medical Supply Chain, Inc.))	
<i>Plaintiff</i>)	Case No. 07-0849-CV-W-FJG
)	
vs.)	
)	
GENERAL ELECTRIC COMPANY,)	
GENERAL ELECTRIC CAPITAL)	
BUSINESS ASSET FUNDING CORPORATION,)	
GE TRANSPORTATION SYSTEMS)	
GLOBAL SIGNALING, L.L.C.)	<u>Jury Requested</u>
JEFFREY R. IMMELT)	
SEYFARTH SHAW LLP)	
STUART FOSTER)	
HEARTLAND FINANCIAL GROUP, Inc.)	
CHRISTOPHER M. MCDANIEL)	
BRADLEY J. SCHLOZMAN)	
<i>Defendants</i>)	

**MOTION FOR LEAVE TO FILE
INSTANTER ENLARGED REPLY SUGGESTION**

Comes now the plaintiff Samuel K. Lipari appearing *pro se* and respectfully which to respond to The local rules of the Western District of Missouri limit a Suggestion in Opposition’s Memorandum of Law section to 10 pages, without prior leave of court. In this case, there is good cause shown for the enlarged Suggestion in Opposition’s memorandum of law.

The petitioner has responded to all ten of the answering defendants’ motions to dismiss in a consolidated single Suggestion in Opposition, thus conserving the resources of the court and aiding opposing counsel in the parties’ thorough resolution of all pleading sufficiency issues before the plaintiff undertakes amendment for their cure.

In short, the purpose of the enlarged Suggestion in Opposition’s memorandum of law is not to waste this court's time with needless additional pages of argument, but to aid this Court in deciding the dismissal requests with 27 pages, far fewer pages than if Suggestions in Opposition for each defendant group had been filed separately.

Accordingly, the petitioner respectfully requests that this court grant the within motion.

Respectfully Submitted,

S/ Samuel K. Lipari
Samuel K. Lipari
297 NE Bayview
Lee's Summit, MO 64064
816-365-1306
saml@medicalsupplychain.com
Pro se

CERTIFICATE OF SERVICE

I certify I have sent a copy via email to the undersigned and opposing counsel via email on 4/04/08.

And served the following counsel for Jeffrey R. Immelt, General Electric Capital Business Asset Funding Corporation, GE Transportation Systems Global Signaling, LLC, and General Electric Company via email at the following addresses:

John K. Power
Leonard L. Wagner
Michael S. Hargens
Husch Blackwell Sanders, LLP
1200 Main Street
Suite 2300
Kansas City, MO 64105
(816)283-4651
Fax: (816)421-0596
john.power@husch.com
lwagner@kcsouthern.com
michael.hargens@husch.com
via email

Attorneys for the GE Defendants

J. Nick Badgerow
Spencer Fane Britt & Browne, LLP
9401 Indian Creek Parkway
Suite 700
Overland Park, KS 66210
(913)327-5134
Fax: (913)345-0736
Email: nbadgerow@spencerfane.com

Attorney for Seyfarth Shaw LLP

Jeffrey P. Ray
Office of the United States Attorney
400 E. 9th St.
Room 5510
Kansas City, MO 64106
(816) 426-3130

Fax: (816) 426-3165
Jeffrey.Ray@usdoj.gov

Attorney for Bradley J. Schlozman

Winton M. Hinkle
Senior Counsel
Hinkle Elkouri LLC
2000 Epic Center
301 North Main Street
Wichita, KS 67202
(316) 660-6163
whinkle@hinklaw.com

Defendant Bradley J. Schlozman's
Kansas Attorney Registration Address