

Lori V. Berke (#015628)
Jody C. Corbett (#019718)
BERKE LAW FIRM, PLLC
1601 N. 7th Street, Suite 360
Phoenix, AZ 85006
Phone: (602) 254-8800
Fax: (602) 254-8808
lori@berkelawfirm.com
jody@berkelawfirm.com
Attorneys for Defendant Big Brothers Big Sisters of
America

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

John CD Doe, a single man,

Plaintiff,

vs.

Big Brothers Big Sisters of America, a
District of Columbia, non-profit
corporation; Big Brothers Big Sisters of
Central Arizona, an Arizona corporation;
John Doe 1-100; Jane Doe 1-100; and Black
& White Corporations 1-100,

Defendants.

Case No. CV2020-014920

**MOTION TO EXCEED THE PAGE
LIMIT FOR REPLY IN SUPPORT OF
MOTION TO DISMISS**

(Assigned to the Hon. M. Scott McCoy)

Pursuant to Ariz. R. Civ. P. 7.1(a)(2), Defendant Big Brothers Big Sisters of America (“BBBSA”), through undersigned counsel, moves for leave of the Court to exceed the eleven (11) page limitation for motions by four (4) pages for its Reply in Support of Motion to Dismiss (exclusive of the caption, signature, and the mailing certification). Plaintiff John CD Doe’s (“Plaintiff”) Complaint contains nine different counts. In its Reply, BBBSA needs to address Plaintiff’s arguments regarding whether each of these nine counts states a claim upon which relief can be granted as well as responding to Plaintiff’s arguments regarding the constitutionality of the statute of limitations (A.R.S. § 12-514 and its applicability provision).

1 Despite BBBSA's best efforts to be concise as possible, BBBSA is unable to effectively
2 respond to all of Plaintiff's arguments without exceeding the page limit. Therefore, BBBSA
3 respectfully requests that this Court allow it to exceed the page limit for its Reply in Support
4 of Motion to Dismiss by four pages (4) pages, making its Reply in Support of Motion to
5 Dismiss fifteen (15) pages, exclusive of the caption, signature block, and mailing
6 certification. The proposed Reply in Support of Motion to Dismiss is attached hereto as
7 Exhibit 1.

8 DATED this 6th day of August, 2021.

9 BERKE LAW FIRM, PLLC

10
11 By /s/ Jody C. Corbett
12 Lori V. Berke
13 Jody C. Corbett
14 Attorneys for Defendant Big Brothers Big
Sisters of America

15 The foregoing document was e-filed
16 with the Clerk of Court this 6th day
17 of August, 2021, and a copy e-served via
AZTurboCourt to:

18 Robert E. Pastor
19 Montoya, Lucero & Pastor, P.A.
20 3200 N. Central Ave., Suite 2550
Phoenix, AZ 85012
21 pastor@mlpattorneys.com
22 Attorneys for Plaintiff

23 Michael S. Daoudi
24 Law Offices of Michael S. Daoudi, PC
25 346 Park Street, Suite 120
Birmingham, Michigan 48009
26 msd@msd4law.com
Attorneys for Plaintiff

1 David L. Abney
2 AHWATUKEE LEGAL OFFICE, P.C.
3 P.O. Box 50351
4 Phoenix, AZ 85076
5 abneymaturin@aol.com
6 Attorneys for Plaintiff

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
/s/ Jody C. Corbett