

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

PATRICK QUINN, IRENE ROBINSON,)
ANTWAIN MILLER, MARC KAPLAN,)
CHRISTOPHER BALL, DANIEL)
MORALES-DOYLE, and JITU BROWN,)

Plaintiffs,)

v.)

BOARD OF EDUCATION OF THE CITY)
OF CHICAGO, *et al.*,)

Defendants.)

No. 16-cv-9514

The Honorable Elaine E. Bucklo

PLAINTIFFS’ MOTION FOR LEAVE TO FILE A BRIEF IN EXCESS OF 15 PAGES

NOW COME Plaintiffs, by and through their undersigned counsel and pursuant to Local Rule 7.1, and move the Court for leave to file a 25-page memorandum in support of their motion for a preliminary injunction. In support of their motion, Plaintiffs state as follows:

1. In this case, Plaintiffs are pursuing multiple legal theories contesting the legality of the provisions of the Illinois School Code that deny only Chicagoans the right to vote for the school board that taxes them and provides public education where they live while providing all other residents of Illinois with that right.

2. Plaintiffs are seeking a preliminary injunction, but also ask the Court to advance the trial on the merits of certain of their claims, which are based entirely on undisputed facts—primarily on matters of public record.

3. Given the unique and complex legal theories at issue in this case, and the type of relief requested, Plaintiffs were unable to confine their statement of facts and argument to the Court’s 15-page limit.

4. Plaintiffs have attached their proposed memorandum, which is 25 pages long, without exhibits, as Exhibit A.

5. Consistent with Local Rule 7.1, the attached memorandum contains a table of contents with the pages noted and a table of authorities.

6. Should the Court grant the instant motion, Plaintiffs will separately re-file their brief with all of the attendant exhibits.

WHEREFORE, Plaintiffs respectfully request that the Court grant them leave to file the 25-page memorandum attached as Exhibit A in support of their motion for a preliminary injunction.

Dated: November 30, 2016

Respectfully submitted,

s/ Sean Morales-Doyle
One of Plaintiffs' Attorneys

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