

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MICHELLE E. DE SOUSA, *et al.*,  
Plaintiffs,

v.

MOON BAY, *et al.*,

Defendants.

Civil Action No.

**FILED UNDER SEAL**

**PLAINTIFFS' MOTION TO EXCEED PAGE LIMIT**

Plaintiffs hereby move for an order granting Plaintiffs permission to file a memorandum of law in excess of the page limitations set by the Court in support of Plaintiffs' *ex parte* application for: a temporary restraining order; an order to show cause why a preliminary injunction should not issue; an asset restraining order; and an order authorizing expedited discovery against Defendants Identified on **Schedule "A"** to the Complaint (collectively, hereinafter referred to as "Defendants") in light of Defendants' intentional and willful manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale, and/or selling of Infringing Products ("Application"), which is being filed herewith.

In this District Court, each Judge is allowed to set his or her own rules regarding the page limitations for filing a memorandum of law. Seeing as Plaintiffs are filing their memorandum of law in support of their Application contemporaneously with their initial pleadings, this case has not yet been opened or assigned a Judge. Accordingly, Plaintiffs are unable to ascertain whether their memorandum of law will exceed any page length restriction established by the designated

Judge. As such, Plaintiffs seek permission to file a memorandum of law in support of their Application that exceeds the assigned Judge's page limitations. Plaintiffs believe that this length is necessary to adequately support its *ex parte* Application.

Accordingly, Plaintiffs respectfully request that the Court grant this motion allowing Plaintiffs to submit a memorandum of law in support of their Application which may exceed the page limit instructed by the Court.

A Proposed Order granting this motion is submitted herewith.

Respectfully submitted,

Dated: November 12, 2024

/s/ Stanley D. Ference III  
Stanley D. Ference III  
Pa. ID No. 59899  
courts@ferencelaw.com

Brian Samuel Malkin  
Pa. ID No. 70448  
bmalkin@ferencelaw.com

FERENCE & ASSOCIATES LLC  
409 Broad Street  
Pittsburgh, Pennsylvania 15143  
(412) 741-8400 – Telephone  
(412) 741-9292 – Facsimile

Attorneys for Plaintiffs