	Case 3:18-cv-00569-MMD-CBC Docun	nent 22	Filed 01/02/19	Page 1 of 4	
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10	Boise, Idaho 83712				
11	(208) 334-1936 david.negri@usdoj.gov				
12 13	Attorneys for the United States of America				
13	and all Defendants				
14	IN THE UNITED STATES DISTRICT COURT				
16	FOR THE DIST	RICT OF	F NEVADA		
17	STATE OF NEVADA,	)	Case No. 3:18-0	ev-569-MMD-CBC	
18	Plaintiff,	)			
19	VS.	)			
20	UNITED STATES; UNITED STATES	)	IINODOGED	MOTION TO	
21	DEPARTMENT OF ENERGY; RICK	)	EXCEED PAC		
22	PERRY, in his official capacity as Secretary of Energy; NATIONAL NUCLEAR	)			
23	SECURITY ADMINISTRATION; and LISA E. GORDON, in her official capacity	)			
24	as Administrator of the National Nuclear	)			
25	Security Administration and Undersecretary for Nuclear Security,	) )			
26	Defendants.	) )			
27		)			
28					

## Case 3:18-cv-00569-MMD-CBC Document 22 Filed 01/02/19 Page 2 of 4

1	Pursuant to LR 7-3, the United States of America, on behalf of all Defendants, requests			
2	that it be allowed to exceed the 24-page page limit in Defendants' Response to Plaintiffs' Motion			
3	For Preliminary Injunction (ECF No. 1-20) by filing a 29-page brief. This motion is supported			
4	by the Declaration of David L. Negri, filed contemporaneously with this Motion. Such			
5	Declaration explains that describing the extensive NEPA background related to this matter, as			
6	well as the history of plutonium use and storage in Nevada and previous communications			
7	between the United States and Nevada regarding this matter, necessitate the page enlargement.			
8	Undersigned counsel has conferred with counsel for Plaintiff, and has been informed that			
9	Plaintiff does not oppose this Motion.			
10	Respectfully submitted, January 2, 2019			
11				
12	/s/ David L. Negri			
13	David L. Negri			
14	United States Department of Justice			
15	Counsel for the United States of America			
16	and all Defendants			
17				
18				
19	IT IS SO ORDERED:			
20				
21	THE HONORABLE MIRANDA M. DU			
22	UNITED STATES DISTRICT JUDGE			
23	DATED:			
24				
25				
26				
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28				
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1	<u>CERTIFICATE OF SERVICE</u>						
2							
3	I hereby certify that a copy of the foregoing document was electronically filed with the Clerk of the Court on January 2, 2019, and served using the CM/ECF system upon the following parties/attorneys of record:						
4	parties/attorneys of record.						
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1					
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9	/a/ David L. Na zwi				
10	<u>/s/ David L. Negri</u> David L. Negri				
11	United States Department of Justice Environment & Natural Resources Division				
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