

STATE OF MICHIGAN
IN THE 30th JUDICIAL CIRCUIT COURT
COUNTY OF INGHAM

CHRISTOPHER LEE DUNCAN,
BILLY JOE BURR, Jr., STEVEN
CONNOR, ANTONIO TAYLOR,
JOSE DAVILA, JENNIFER
O'SULLIVAN, CHRISTOPHER
MANIES and BRIAN SECREST,
on behalf of themselves and all
others similarly situation,

Case No. 07-242-CZ

HON. LAURA BAIRD

Plaintiffs,

v

STATE OF MICHIGAN and
JENNIFER M. GRANHOLM,
Governor of the State of Michigan,
sued in her official capacity,

Defendants.

Michael J. Steinberg (P43085)
Kary L. Moss (P49759)
Mark P. Fancher (P56223)
American Civil Liberties Union
Fund of Michigan
Attorneys for Plaintiffs
60 West Hancock
Detroit, MI 48201
(313) 578-6800

Frank D. Eaman (P13070)
Attorney for Plaintiffs
645 Griswold Street
Detroit, MI 48226
(313) 962-7210

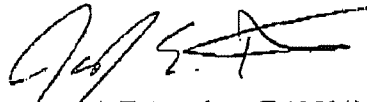
Joseph E. Potchen (P49501)
Denise C. Barton (P41535)
Jason E. Evans (P61567)
Assistant Attorneys General
Public Employment, Elections & Tort Div.
Attorneys for Defendants
P.O. Box 30736
Lansing, MI 48909
(517) 373-6434

**MOTION TO FILE BRIEF
IN EXCESS OF TWENTY PAGES**

Defendants, State of Michigan and Jennifer M. Granholm, by their attorneys, pursuant to MCR 2.119(A)(2), request this Court to permit Defendants to file a brief in excess of twenty (20) pages on the grounds that the Brief in Support of Motion for Summary Disposition addresses the important and complex issues presented in this matter. Eight Plaintiffs have brought a 49-page multi-count Complaint seeking declaratory and injunctive relief against the Defendants based on the constitutional guarantees of right to counsel as set forth in the U. S. and Michigan Constitutions. Due to the extensive pleadings and deficiencies in Plaintiffs' Complaint, Defendants request this Court to allow an additional ten (10) pages beyond the twenty (20) pages set forth under MCR 2.119 for their Motion and Brief, excluding Table of Contents and Index of Authorities.

Respectfully submitted,

Michael A. Cox
Attorney General



Joseph E. Potchen (P49501)
Denise C. Barton (P41535)
Jason E. Evans (P61567)
Attorneys for Defendant

Dated: April 5, 2007
2007005640A/mot extend page limit

PROOF OF SERVICE

Lisa S. Albro certifies that on the 5th day of April, 2007, she served a copy of the above document in this matter on all counsel of record and parties *in pro per* at their last known addresses via first class mail by depositing same in a United States Post Office depository in Lansing, Michigan with first class postage fully paid.



Lisa S. Albro

STATE OF MICHIGAN
IN THE 30th JUDICIAL CIRCUIT COURT
COUNTY OF INGHAM

CHRISTOPHER LEE DUNCAN,
BILLY JOE BURR, Jr., STEVEN
CONNOR, ANTONIO TAYLOR,
JOSE DAVILA, JENNIFER
O'SULLIVAN, CHRISTOPHER
MANIES and BRIAN SECREST,
on behalf of themselves and all
others similarly situation,

Case No. 07-242-CZ

HON. LAURA BAIRD

Plaintiffs,

v

STATE OF MICHIGAN and
JENNIFER M. GRANHOLM,
Governor of the State of Michigan,
sued in her official capacity,

Defendants.

Michael J. Steinberg (P43085)
Kary L. Moss (P49759)
Mark P. Fancher (P56223)
American Civil Liberties Union
Fund of Michigan
Attorneys for Plaintiffs
60 West Hancock
Detroit, MI 48201
(313) 578-6800

Frank D. Eaman (P13070)
Attorney for Plaintiffs
645 Griswold Street
Detroit, MI 48226
(313) 962-7210

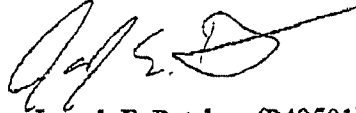
Joseph E. Potchen (P49501)
Denise C. Barton (P41535)
Jason E. Evans (P61567)
Assistant Attorneys General
Public Employment, Elections & Tort Div.
Attorneys for Defendants
P.O. Box 30736
Lansing, MI 48909
(517) 373-6434

**BRIEF IN SUPPORT OF MOTION TO FILE BRIEF
IN EXCESS OF TWENTY PAGES**

Defendants rely on MCR 2.119(A)(2) and this pleading in support of their motion to file brief in excess of the twenty (20) page limitation set forth in the court rule.

Respectfully submitted,

Michael A. Cox
Attorney General

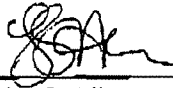


Joseph E. Potchen (P49501)
Denise C. Barton (P41535)
Jason E. Evans (P61567)
Attorneys for Defendant

Dated: April 5, 2007
2007005640A/breif02 extend page limit

PROOF OF SERVICE

Lisa S. Albro certifies that on the 5th day of April, 2007, she served a copy of the above document in this matter on all counsel of record and parties *in pro per* at their last known addresses via first class mail by depositing same in a United States Post Office depository in Lansing, Michigan with first class postage fully paid.



Lisa S. Albro