

United States District Court
District of Maine

<p>PUBLIC INTEREST LEGAL FOUNDATION, INC.</p> <p><i>Plaintiff,</i></p> <p>v.</p> <p>SHENNA BELLOWS, in her official capacity as the Secretary of State for the State of Maine</p> <p><i>Defendant.</i></p>	<p>Case No. 1:20-cv-00061-GZS</p>
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Joint Motion to Set Briefing Schedule for Motions for Summary Judgment

Pursuant to Local Rule 56(h), the parties jointly move the Court to adopt the following briefing schedule for summary judgment motions, which is agreed to by all parties. The parties also agree that a pre-filing conference with a judicial officer is not necessary.

I. Deadlines and Page Limits.

The parties propose the following cross-motion schedule, which affords each party an equal number of pages (37):¹

- Stipulations of material fact: No later than **September 26, 2022.**
- Plaintiff's motion for summary judgment (page limit: 20): **October 19, 2022.**
- Defendant's cross-motion for summary judgment and response to Plaintiff's motion for summary judgment (page limit: 30): **November 18, 2022.**
- Plaintiff's response to Defendant's motion for summary judgment and reply in support of Plaintiff's motion for summary judgment (page limit: 17): **December 9, 2022.**
- Defendant's reply in support of Defendant's motion for summary judgment and sur-reply to Plaintiff's motion for summary judgment (page limit: 7): **December 23, 2022.**

¹ Page limits are applicable to each party's memorandum of law. They do not apply to attached "affidavits and other documents setting forth or evidencing facts on which the motion is based," L.R. 7(a), or the separate supporting, opposing, and reply statements of fact required by Local Rule 56.

II. Estimated Number of Statements of Material Fact.

A. Plaintiff tentatively estimates that it will present fewer than sixty (60) supporting statements of material fact with its motion for summary judgment. Plaintiff may also present any additional facts necessary to oppose Defendant's motion for summary judgment or support its reply memorandum.

B. Defendant tentatively estimates that she will present fewer than sixty (60) supporting statements of material fact with her motion for summary judgment. Defendant may also present any additional facts necessary to oppose Plaintiff's motion for summary judgment or support her reply memorandum.

III. Stipulations of Fact.

The parties anticipate stipulating to facts concerning pre-litigation correspondence between the parties, (*see, e.g.*, Docs. 55-1 – 55-7), and possibly additional facts. Any such stipulations will be made solely pursuant to Local Rule 56(b) and will be filed by the deadline established in the proposed schedule.

IV. *Daubert/Kumho* Motions

At this time, neither party intends to file a *Daubert* or *Kumho* motion.

Dated: September 2, 2022.

For Plaintiff:

/s/ Noel H. Johnson
Noel H. Johnson* (Wisconsin Bar
#1068004)
Kaylan L. Phillips* (Indiana Bar #30405-84)
Public Interest Legal Foundation, Inc.
32 E. Washington St., Ste. 1675
Indianapolis, IN 46204
Tel: (317) 203-5599
Fax: (888) 815-5641
njohnson@PublicInterestLegal.org
kphillips@PublicInterestLegal.org
* *Admitted pro hac vice*

Steve C. Whiting
The Whiting Law Firm
75 Pearl Street, Ste. 207
Portland, ME 04101
Tel: (207) 780-0681
Fax: (207) 780-0682
steve@whitinglawfirm.com

For Defendant:

AARON M. FREY
Attorney General

/s/ Jonathan R. Bolton (with permission)
JONATHAN R. BOLTON
Assistant Attorney General
Office of the Attorney General
6 State House Station
Augusta, ME 04333-0006
Tel. (207) 626-8551
Jonathan.bolton@maine.gov

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CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2022, I electronically filed the foregoing using the Court's ECF system, which will serve notice on all parties.

/s/ Noel H. Johnson
Noel H. Johnson
Counsel for Plaintiff
njohnson@PublicInterestLegal.org

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