

The Honorable Robert S. Lasnik
The Honorable David G. Estudillo
The Honorable Lawrence VanDyke

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

SUSAN SOTO PALMER et al.,

Plaintiffs,

v.

STEVEN HOBBS, in his official capacity
as Secretary of State of Washington, et al.,

Defendants,

and

JOSE TREVINO et al.,

Intervenor-Defendants.

Case No.: 3:22-cv-5035-RSL

**INTERVENOR-DEFENDANTS’
UNOPPOSED MOTION FOR LEAVE
TO FILE AN OVER-LENGTH
POST-TRIAL BRIEF¹**

BENANCIO GARCIA III,

Plaintiff,

v.

STEVEN HOBBS, in his official capacity
as Secretary of State of Washington, et al.,

Defendants.

Case No.: 3:22-cv-5152-RSL-DGE-LJCV

**PLAINTIFF’S
UNOPPOSED MOTION FOR LEAVE
TO FILE AN OVER-LENGTH
POST-TRIAL BRIEF¹**

Pursuant to the Court’s directions regarding the length of parties’ post-trial brief, (*see* Trial Tr. 880:3–12), *Soto Palmer* Intervenor-Defendants Jose Trevino, Ismael Campos and Alex Ybarra,

¹ This Motion for Leave to File an Over-Length Post-Trial Brief is being filed concurrently in both *Soto Palmer v. Hobbs*, No. 3:22-cv-5035, and *Garcia v. Hobbs*, No. 3:22-cv-5152.

1 and *Garcia* Plaintiff Benancio Garcia III (collectively, “Movants”), hereby request that the Court
2 grant leave to file a joint post-trial brief in excess of 40 pages.

3 Specifically, Movants seek to file a joint post-trial brief of up to 50 pages, which they
4 believe will be more efficient for the Court than filing two separate sub-40-page briefs in *Soto*
5 *Palmer* and *Garcia* that would contain some overlapping and some distinct material.

6 At the end of trial, the Court indicated that it was “not going to set page limits,” but
7 requested that counsel “try to keep them in the 30-page neighborhood,” or if the brief exceeds 40
8 pages, “please seek permission.” (Trial Tr. 880:3–12.) Movants are, therefore, seeking such
9 permission from the Court.

10 Additionally, Counsel for Movants have contacted Counsel for all other parties in both
11 *Soto Palmer* and *Garcia*, and no party opposes Movants’ request to file a single, 50-page closing
12 brief.

13 In light of these factors, Movants respectfully request the Court’s leave to file a joint post-
14 trial brief with up to ten (10) additional pages, for a total limit of fifty (50) pages.

15 DATED this 12th day of July, 2023.

16 Respectfully submitted,

17 s/ Andrew R. Stokesbary
18 Andrew R. Stokesbary, WSBA No. 46097
19 CHALMERS, ADAMS, BACKER & KAUFMAN, LLC
20 701 Fifth Avenue, Suite 4200
21 Seattle, WA 98104
22 T: (206) 207-3920
23 dstokesbary@chalmersadams.com

24 Jason B. Torchinsky (admitted pro hac vice)
25 Phillip M. Gordon (admitted pro hac vice)
26 Caleb Acker (admitted pro hac vice)
27 Andrew Pardue (admitted pro hac vice²)
HOLTZMAN VOGEL BARAN
TORCHINSKY & JOSEFIK PLLC
15405 John Marshall Hwy
Haymarket, VA 20169
T: (540) 341-8808

² Admitted *pro hac vice* in *Soto Palmer v. Hobbs* only.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

jtorchinsky@holtzmanvogel.com
pgordon@holtzmanvogel.com
apardue@holtzmanvogel.com

Dallin B. Holt (admitted pro hac vice)
Brennan A.R. Bowen (admitted pro hac vice²)
HOLTZMAN VOGEL BARAN
TORCHINSKY & JOSEFIK PLLC
Esplanade Tower IV
2575 East Camelback Rd
Suite 860
Phoenix, AZ 85016
T: (540) 341-8808
dholt@holtzmanvogel.com
bbowen@holtzmanvogel.com

*Counsel for Soto Palmer Intervenor-Defendants
and Garcia Plaintiff*

CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing document with the Clerk of the Court of the United States District Court for the Western District of Washington through the Court's CM/ECF System, which will serve a copy of this document upon all counsel of record.

DATED this 12th day of July, 2023.

Respectfully submitted,

s/ Andrew R. Stokesbary
Andrew R. Stokesbary, WSBA No. 46097

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

The Honorable Robert S. Lasnik
The Honorable David G. Estudillo
The Honorable Lawrence VanDyke

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SUSAN SOTO PALMER et al.,

Plaintiffs,

v.

STEVEN HOBBS, in his official capacity
as Secretary of State of Washington, et al.,

Defendants,

and

JOSE TREVINO et al.,

Intervenor-Defendants.

Case No.: 3:22-cv-5035-RSL

**[PROPOSED] ORDER GRANTING
INTERVENOR-DEFENDANTS'
MOTION TO FILE AN OVER-
LENGTH POST-TRIAL BRIEF**

BENANCIO GARCIA III,

Plaintiff,

v.

STEVEN HOBBS, in his official capacity
as Secretary of State of Washington, et al.,

Defendants.

Case No.: 3:22-cv-5152-RSL-DGE-LJCV

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION TO FILE AN
OVER-LENGTH POST-TRIAL BRIEF**

THIS MATTER has come before the Court, on the request of *Soto Palmer* Intervenor-
Defendants Jose Trevino, Ismael Campos and Alex Ybarra, and *Garcia* Plaintiff Benancio Garcia

1 III (collectively, “Movants”) that the Court grant leave to file a single, joint brief in excess of the
2 forty (40) pages directed by the Court, (*see* Trial Tr. 880:3–12).

3 Having reviewed the Movants’ Motion to File Over-Length Post-Trial Brief, and finding
4 good cause for granting Movants’ motion, the Court hereby rules as follows:

5 Movants’ Motion to File Over-Length Post-Trial Brief is hereby GRANTED. Movants are
6 granted leave to file a post-trial brief with ten (10) additional pages, for a total of fifty (50) pages.

7
8 DATED this 12th day of July, 2023.

9
10 *s/* _____
11 HONORABLE ROBERT S. LASNIK
12 UNITED STATES DISTRICT JUDGE
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27