IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF FLORIDA TALLAHASSEE DIVISION

JANE DOE et al.,

Plaintiffs,

Civil No. 4:23-cv-00114-RH-MAF

v.

JOSEPH A. LADAPO et al.,

Defendants.

MOTION FOR LEAVE TO FILE POST-TRIAL MEMORANDUM OF LAW

Pursuant to Federal Rule of Civil Procedures 7(b) and Local Rule 7.1, Plaintiffs respectfully request leave to file a 5-page post-trial memorandum of law for the reasons listed herein. Plaintiffs are prepared to file upon grant of this motion. Defendants oppose this motion.

At trial, the parties offered differing views about what is legally sufficient to prove impermissible discrimination under the Equal Protection Clause of the Fourteenth Amendment. At closing, the Court asked questions relating to the legal standard applicable to this case. Plaintiffs file this short post-trial memorandum of law to clarify the applicable precedent.

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CERTIFICATE OF WORD COUNT

Pursuant to Local Rule 7.1(F), the undersigned counsel certifies that,

according to Microsoft Word, the word-processing system used to prepare this

Motion, there are 401 total words contained within the Motion.

/s/ Chris Erchull

Chris Erchull

CERTIFICATE OF SATISFATION OF ATTORNEY CONFERENCE REQUIREMENT

Pursuant to Local Rule 7.1(B), counsel for Plaintiffs conferred with counsel

for Defendants on December 27, 2023. Counsel for Defendants indicated that

Defendants oppose the relief sought.

CERTIFICATE OF SERVICE

I hereby certify that, on December 28, 2023, I electronically filed the

foregoing with the Clerk of the Court by using the CM/ECF system.

/s/ Chris Erchull

Chris Erchull

Counsel for Plaintiffs

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