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20 UNITED STATES DISTRICT COURT
21 FOR THE CENTRAL DISTRICT OF CALIFORNIA

22 LOS ANGELES HOMELESS
23 SERVICES AUTHORITY, a joint
powers authority,

24 Plaintiff,

25 v.

26 DONALD J. TRUMP, *et al.*,

27 Defendants.
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No. 2:26-cv-07056-DOC-AJR

**DEFENDANTS' OPPOSITION TO
PLAINTIFF'S *EX PARTE*
APPLICATION TO EXCEED L.R. 11-
6.1 WORD LIMIT ON *EX PARTE*
APPLICATION FOR PRELIMINARY
RELIEF [DKT. 14]**

Honorable David O. Carter
United States District Judge

MEMORANDUM OF POINTS AND AUTHORITIES

Defendants, by and through undersigned counsel, file this opposition to Plaintiff's *ex parte* application for a request to file excess pages for its brief in support of its motions to for a temporary restraining order ("TRO"). Dkt. 14.

Plaintiff first notified the government of the TRO motion after close of business on Thursday, June 25. The parties conferred on June 29, and Plaintiffs filed its motion that evening and served it on Defendants' counsel at 7:36 p.m. PST. The application, seeking relief from an agency action taken 18 days earlier, contains 16,207 words and spans 50 pages. There are four claims in the Complaint, and all four rely on the same set of factual allegations. There is no need for a 200% overlength brief, and the Court should deny Plaintiff's *ex parte* request.

Page limitations are designed to conserve judicial and litigant resources by compelling the parties to advance only their best arguments and to do so concisely. Although there are circumstances when enlargements are warranted, this is not one of them. While Plaintiff has the right to move for preliminary relief on any or all four counts in its Complaint, it must do so within the rules, including the page limitation imposed by the local rules.

The normal rules of this Court permit 7,000 words. That should be plenty for Plaintiff. If Plaintiffs needs additional space, it could do something other than simply ask for more-than-double the amount allowed. Under Local Rule 11-6.1, declarations, exhibits, and indices are already excluded from the word limit. Plaintiff has ample room to present its evidence via an appendix. A 16,207-word *memorandum* means the brief is repetitive and unnecessary.

Due to the expedited nature of TRO proceedings, Defendants will have only a couple days to review, research, and respond to Plaintiff's arguments—far less than the 18 days Plaintiff had to prepare its filing. Forcing Defendants to reply to a massively oversized brief in an emergency window is highly prejudicial.

Nor is there any justification for Plaintiff filing its application to exceed the word

1 limit *ex parte*. “Circumstances justifying the issuance of an *ex parte* order are extremely
2 limited.” *Reno Air Racing Ass’n, Inc. v. McCord*, [452 F.3d 1126, 1131](#) (9th Cir. 2006)
3 (citing *Granny Goose Foods, Inc. v. Teamsters*, [415 U.S. 423, 438-39](#) (1974)). “A party
4 filing an *ex parte* application must support its request for emergency relief with
5 ‘evidence . . . that the moving party’s case will be irreparably prejudiced if the
6 underlying motion is heard according to regularly noticed motion procedures,’ and a
7 showing ‘that the moving party is without fault in creating the crises that requires *ex*
8 *parte* relief, or that the crisis occurred as a result of excusable neglect.’” *Doe v. U.S.*
9 *Immigration & Customs Enforcement*, 2:25-cv-11962-MWC-AS, [2025 WL 4231619](#), at
10 *1 (C.D. Cal. Dec. 29, 2025) (quoting *Mission Power Eng’g Co. v. Cont’l Cas. Co.*, [883](#)
11 [F. Supp. 488, 492](#) (C.D. Cal. 1995)). Although Plaintiff insists that “[t]ime is of the
12 essence,” it fails to explain why it is not at fault for its decision not to seek relief for
13 more than two weeks after the challenge agency action.

14 For these reasons, Defendants respectfully request that the Court deny Plaintiff’s
15 *ex parte* application for a request to file an overlength brief.
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1 Dated: July 1, 2026

Respectfully submitted,

2 UNITED STATES DEPARTMENT OF
JUSTICE

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14 /s/ Alexander L. Farrell
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18 **Local Rule 11-6.2 Certificate of Compliance**

19 The undersigned counsel of record certifies that this Opposition Brief contains 545
20 words, which complies with the word count set by the Court's Standing Order.

21 Dated: July 1, 2026

/s/ Alexander L. Farrell

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