

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

**Case No.: 1:25-cv-20757-JB/Torres**

JANE DOE, Plaintiff,

v.

STEVEN K. BONNELL II,

Defendant.

**PLAINTIFF JANE DOE’S MOTION FOR LEAVE TO EXCEED PAGE LIMIT ON  
REPLY MEMORANDUM**

COMES NOW, Jane Doe, by and through the undersigned counsel, pursuant to Rule 7.1(c)(2) of the Local Rules of the United States District Court for the Southern District of Florida and Rule 7(b) of the Federal Rules of Civil Procedure, respectfully requests this Court for leave to exceed the 10-page limit for the reply memorandum, Plaintiff Jane Doe’s Reply to Opposition for Preliminary Injunction, in support of Plaintiff’s Motion for Preliminary Injunction [ECF No. 21].

1. Pursuant to Local Rule 7.1(c)(2), a reply memorandum is limited to 10 pages unless prior leave of court is obtained.
2. This reply memorandum is necessary to address the arguments raised in the opposition to Plaintiff’s Motion for a Preliminary Injunction [ECF No. 21].
3. Due to the number of arguments raised in Defendant’s Opposition to Plaintiff’s Motion for Preliminary Injunction [ECF No. 42], additional pages are required for Plaintiff to adequately address the matters and provide the Court with a complete understanding and analysis of the issues Defendant alleges in their opposition.

4. Plaintiff has made efforts to be as concise as possible and limit the reply to the most important issues.
5. The additional pages are necessary to ensure that the Court has a full understanding of the issues and arguments presented, including misrepresentations and requests made by Defendant in their opposition.
6. Granting this motion will not prejudice any party.

WHEREFORE, Ms. Doe respectfully requests that this Court grant leave to file a reply memorandum exceeding the five (5) page limit, and allow the reply memorandum to be up to fifteen (15) pages in length.

**CERTIFICATE OF CONFERRAL PURSUANT TO LOCAL RULE 7.1(a)(2)**

WE HEREBY CERTIFY that counsel for movant made an effort today to confer with opposing counsel regarding the relief sought in this motion but was unable to confer. In light of the time-sensitive nature of this matter, the motion is being filed in an abundance of caution. Counsel will continue to make diligent efforts to confer with opposing counsel and come to an agreement. Upon same, counsel will update the Court.

Dated: May 2, 2025.

Respectfully submitted,

**SANCHEZ-MEDINA, GONZALEZ, QUESADA,  
LAGE, GOMEZ & MACHADO, LLP**

/s/Carlos A. Garcia Perez

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 2, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF filing system and copies were electronically sent to all counsel of records via the same.

By: /s/Carlos A. Garcia Perez  
Attorney