

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA -- ATLANTA DIVISION**

WILLIAM M. WINDSOR,)	
Plaintiff)	
)	
v.)	CIVIL ACTION NO.
)	
JUDGE WILLIAM S. DUFFEY,)	1:11-CV-01922-TWT
MAID OF THE MIST)	
CORPORATION, MAID OF THE)	EMERGENCY MOTION
MIST STEAMBOAT COMPANY,)	
LTD., JUDGE ORINDA D. EVANS,)	
JUDGE JULIE E. CARNES, JUDGE)	
JOEL F. DUBINA, JOHN LEY, AND)	
JAMES N. HATTEN,)	
Defendants.)	
_____)	

**WILLIAM M. WINDSOR'S EMERGENCY REQUEST FOR CONSENT TO
FILE MOTION FOR LEAVE TO EXCEED PAGE LIMITATION**

COMES NOW Plaintiff William M. Windsor, and moves this Court to request consent to file a motion for an Order granting permission for Defendant:" to exceed the 25 page limitation set forth in LR 7.ID, NDGa, by twenty-five (25) pages with regard to RESPONSE TO FEDERAL DEFENDANTS' MOTION TO DISMISS AND IN-DWELLING MEMORANDUM OF LAW IN SUPPORT THEREOF. Support for moving Windsor's request is set forth in the Memorandum immediately below.

1. Rule 7.1 (D) of the United States District Court for the Northern District of Georgia's Local Rules of Civil Procedure provides: "Absent prior permission of the court, briefs in support of a motion or in response to a motion are limited in length to twenty-five (25) pages." Defendant William M. Windsor hereby respectfully requests that he be allowed to exceed the 25 page limitation with regard to his Motion to Remand insofar as (1) there are numerous facts to be considered in this case; (2) the issues presented are complex; (3) there are many legal considerations; (4) this matter now includes two related actions that present additional relevant facts; (5) there are numerous procedural and substantive reasons for the denial of the motion that must be detailed, including extensive jurisdictional issues; and (5) Windsor is pro se and is afraid to reduce to 25 pages when all of this information seems important. Consequently, more than 25 pages are necessary for Windsor to properly present his Response for the Court's consideration.

2. WHEREFORE, Windsor respectfully requests that the Court grant Windsor's request to file a motion for permission to exceed the page limitation set forth in LR 7.1D, NDGa., with regard to William M. Windsor's RESPONSE TO FEDERAL DEFENDANTS' MOTION TO DISMISS.

Submitted, this 21st day of July 2011.

A handwritten signature in black ink, appearing to read "William M. Windsor". The signature is written in a cursive style with a horizontal line underneath it.

William M. Windsor
Pro Se

PO Box 681236
Marietta, GA 30068
Telephone: 770-578-1094
Facsimile: 770-234-4106
Email: williamwindsor@bellsouth.net

VERIFICATION OF WILLIAM M. WINDSOR

I, William M. Windsor, swear that I am authorized to make this verification and that the facts alleged in the foregoing REQUEST are true and correct based upon my personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters I believe them to be true.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This 21st day of July 2011.

A handwritten signature in black ink, appearing to read "William M. Windsor", written in a cursive style. The signature is positioned above a horizontal line.

William M. Windsor

CERTIFICATE OF COMPLIANCE

As required by Local Rule 7.1D, N.D. Ga., I hereby certify that this pleading has been prepared in Times New Roman 14-point font, one of the font and point selections approved by this Court in Local Rule 5.1B, N.D. Ga.



William M. Windsor

Pro Se

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Marietta, GA 30068
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Facsimile: 770-234-4106
Email: williamwindsor@bellsouth.net

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing REQUEST by mail with sufficient postage addressed to:

CHRISTOPHER J. HUBER
ASSISTANT U.S. ATTORNEY
Georgia Bar No. 545627
600 Richard B. Russell Federal Bldg.
75 Spring Street, S.W. -- Atlanta, Georgia 30303
Telephone: (404) 581-6292 -- Facsimile: (404) 581-6181
Email: chris.huber@usdoj.gov

I have also prepared a copy for each Defendant to be served with the Summons and Complaint.

This 21st day of July 2011.



William M. Windsor
Pro Se

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