

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

---

SHIVA AYYADURAI,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 17-10011 (FDS)
	)	
FLOOR64, INC., <i>et al.</i> ,	)	
	)	
Defendants.	)	

---

**ASSENTED-TO MOTION FOR LEAVE TO FILE TWO MEMORANDA OF LAW IN  
EXCESS OF THE PAGE LIMITATIONS SET FORTH IN LOCAL RULE 7.1**

Plaintiff Shiva Ayyadurai, through counsel, respectfully moves the Court for leave to file pages in excess of the presumptive page limitation set forth in Local Rule 7.1 for memoranda of law in opposition to the Defendants’ Motion to Dismiss, Dkt. 11, and Special Motion to Strike Pursuant to California Anti-SLAPP Law, Dkt. 14. The Plaintiff requests leave to file up to an additional five pages for each memorandum. The reasons are set forth below.

With Mr. Ayyadurai's consent, the Defendants' filed a Motion for Leave to File Excess Pages for its Motion to Dismiss. Dkt. 12 In that Motion, the Defendants noted the fact-intensive nature of the case, requiring analysis of 84 statements Mr. Ayyadurai asserts are defamatory. *Id.* The Court granted that Motion. Dkt. 17 Similarly, the Plaintiff must discuss the same statements and explain why each is defamatory under the law. Accordingly, Mr. Ayyadurai requests leave to file an Opposition to the Defendants' Motion to Dismiss that contains up to five pages in excess of the presumptive limit.

Additionally, to oppose the Defendants' Motion to Strike Pursuant to California's Anti-SLAPP Law, Mr. Ayyadurai must analyze a number of complex issues and also present new facts to rebut their assertions. Given the novel nature of the Defendants' Motion to Strike and to assist the Court in analyzing the law, Mr. Ayyadurai requests leave to file an Opposition to that Motion that contains up to five pages in excess of the presumptive page limit.

The Defendants, through counsel, have assented to this request.

Accordingly, Plaintiff Shiva Ayyadurai respectfully move the Court for leave to file a memorandum in opposition to Defendants' Motion to Dismiss, Dkt 11, that contains up to five excess pages, and for leave to file a memorandum in opposition to Defendants' Motion to Strike, Dkt. 14, that contains up to five excess pages.

Dated: March 9, 2017

Respectfully submitted,

CORNELL DOLAN, P.C.

By: /s/ Timothy Cornell  
Timothy Cornell, BBO # 654412  
One International Place, Suite 1400  
Boston, MA 02110  
Tel: (617) 535-7763  
Fax: (617) 535-7721  
[tcornell@cornelldolan.com](mailto:tcornell@cornelldolan.com)

HARDER MIRELL & ABRAMS LLP

By: /s/ Charles J. Harder  
Charles J. Harder, Esq.  
(Pro Hac Vice application pending)  
132 S. Rodeo Drive, Suite 301  
Beverly Hills, California 90212  
Tel. (424) 203-1600  
Email: [CHarder@HMAfirm.com](mailto:CHarder@HMAfirm.com)  
Counsel for Plaintiff Shiva Ayyadurai

RULE 7.1 CERTIFICATE OF CONFERENCE

I hereby certify that, in accordance with Local Rule 7.1, we conferred with Counsel for the Defendants and they have agreed to the above-filed Unopposed Motion for Extension.

/s/ Timothy Cornell

CERTIFICATE OF SERVICE

I hereby certify that the above document is to be filed through the ECF system and will be sent electronically to Defendants.

/s/ Timothy Cornell