

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
NORTHERN DIVISION AT COVINGTON

NICHOLAS SANDMANN, ET AL.,

PLAINTIFFS,

V.

NO. 2:19-cv-19-WOB-CJS

WP COMPANY LLC D/B/A THE WASHINGTON
POST,

DEFENDANT.

THE WASHINGTON POST’S MOTION FOR ADDITIONAL PAGES

Pursuant to Local Rule 7.1(d), WP Company LLC d/b/a The Washington Post (“the Post”) moves for leave to file a memorandum not to exceed 45 pages in support of its motion to dismiss. Defendant’s responsive pleading to the complaint is due April 9, 2019.

The Post has good cause for this motion. Plaintiff has accused the Post of defaming him in its coverage of a January 18, 2019, incident at the Lincoln Memorial in Washington, D.C. In his 38-page, 213-allegation complaint, Plaintiff challenges several dozen statements spread across seven different Post articles, and three Tweets promoting one of those articles. Plaintiff seeks \$50 million in compensatory damages and \$200 million in punitive damages.

The Post believes the complaint is inadequate on numerous grounds and that dismissal of all of Plaintiff’s claims is necessary. However, given the numerous statements at issue, the Post will require more pages than typically needed for a supporting memorandum in order to address Plaintiff’s voluminous allegations with the requisite level of detail.

Accordingly, the Post requests that this Court allow it to file a memorandum in support of its planned motion to dismiss that will not exceed 45 pages.

/s/ Bethany A. Breetz

William G. Geisen
STITES & HARBISON, PLLC
100 East RiverCenter Boulevard, Suite 450
Covington, KY 41011
Telephone: (859) 652-7601

Philip W. Collier
Bethany A. Breetz
STITES & HARBISON, PLLC
400 West Market Street, Suite 1800
Louisville, KY 40202-3352
Telephone: (502) 587-3400

Counsel for The Washington Post

Certificate of Service

I hereby certify that on April 2, 2019, I electronically filed the foregoing document with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to registered CM/ECF participants.

/s/ Bethany A. Breetz

Counsel for The Washington Post

1300800:1:LOUISVILLE