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7 FIRST JUDICIAL DISTRICT COURT

8 CARSON CITY, NEVADA

9  
10 AMERICAN CIVIL LIBERTIES UNION OF  
11 NEVADA,

12 Petitioner,

13 vs.

14 THE STATE OF NEVADA, DEPARTMENT OF  
15 MOTOR VEHICLES, a governmental entity,

16 Respondent.

Case No.: 25 EW 00026 1B

Department: #

**MOTION TO EXCEED PAGE  
LIMIT FOR PETITION FOR A  
WRIT OF MANDAMUS**

17 Petitioner respectfully requests permission from the Court to exceed the 15-page limit set  
18 forth in Local Rule 10.7 for their forthcoming Memorandum in Support of Petition for a Writ of  
19 Mandamus.

20 This Motion is based on the following Memorandum of Points and Authorities, the  
21 Declaration of Sadmira Ramic attached as Exhibit 1, the papers and pleadings to be filed, and any  
22 oral argument the Court may choose to consider.

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24 DATED: August 15, 2025.

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AMERICAN CIVIL LIBERTIES UNION  
OF NEVADA



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Sadmira Ramic (15984)  
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**MEMORANDUM OF POINTS AND AUTHORITIES**

Local Rule 10.7 provides that a petition for a writ of mandamus is limited to 15 pages without leave of the court. LR 10.7 also provides that a motion to exceed page count must be based upon a showing of good cause. Courts have found good cause to exceed page count when “the issues presented in this litigation are complex and susceptible of lengthy exposition.” *Nev. Power Co. v. El Paso Corp.*, No. CV-S-03-0875-RLH (RJJ), 2005 U.S. Dist. LEXIS 55637, at \*11 (D. Nev. Aug. 16, 2005); *see also Jacobs v. Clark County School Dist.*, 373 F. Supp. 2d 1162, 1168 (D. Nev. 2005) (finding that a motion to exceed page limit was warranted because the issues addressed were “substantial and susceptible of lengthy exposition”). Here, there is good cause to support Petitioners’ motion to exceed page limit in the Petition for a Writ of Mandamus. *See Ramic Decl.*, attached hereto as Exhibit 1.

First, the issues presented in the Petition for a Writ of Mandamus involve four separate but related submissions for public records by American Civil Liberties Union (ACLU) of Nevada to the Nevada Department of Motor Vehicles (DMV). Each submission involved communication between the parties for over six months, including discussions with the DMV’s counsel prior to litigation being filed. The standard page limit would omit key facts necessary to establish each and

1 every violation of the Nevada Public Records Act (NPRA). As such, good cause for additional  
2 pages exists.

3 Second, the issues presented in the petition involve lengthy exposition. *Jacobs v. Clark*  
4 *County School Dist.*, 373 F. Supp. 2d 1162, 1168 (D. Nev. 2005). The analysis for the legal claims  
5 requires detailed discussion on: 1) the public records requests submitted by ACLU of Nevada; 2)  
6 the exemptions, or lack thereof, invoked by the DMV; 3) the review of voluminous documents at  
7 issue in the case; 4) all communications between the parties over the course of six months; and 5)  
8 the multiple ways the DMV violated the NPRA.

9 Petitioner respectfully requests this Court to exceed the page count for Petitioners' Writ of  
10 Mandamus to 28 pages.

11 DATED: August 15, 2025.

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14 \_\_\_\_\_  
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**INDEX OF EXHIBITS**

EXHIBIT 1: Declaration of Sadmira Ramic

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# **EXHIBIT 1**

1 **DECL**  
2 **SADMIRA RAMIC, ESQ. (15984)**  
3 **CHRISTOPHER M. PETERSON, ESQ. (13932)**  
4 **AMERICAN CIVIL LIBERTIES**  
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13 **FIRST JUDICIAL DISTRICT COURT**

14 **CARSON CITY, NEVADA**

15 AMERICAN CIVIL LIBERTIES UNION OF  
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17 Petitioner,

18 vs.

19 THE STATE OF NEVADA, DEPARTMENT OF  
20 MOTOR VEHICLES, a governmental entity,

21 Respondent.

Case No.:

Department:

**DECLARATION OF SADMIRA**  
**RAMIC IN SUPPORT OF**  
**MOTION TO EXCEED PAGE**  
**LIMIT FOR PETITION FOR A**  
**WRIT OF MANDAMUS**

22 I, Sadmira Ramic, hereby declare as follows:

- 23 1. I am the Senior Staff Attorney of the American Civil Liberties Union of Nevada.
- 24 2. I make this declaration in support of the Motion to Exceed Page Limit in Petitions for Writ  
of Mandamus.
3. Local Rule 10.7 provides that all petitions for a writ of mandamus are limited to 15 pages  
absent a good cause reason to exceed this page limit.
4. There is good cause to allow the petitioner to exceed the page count listed under LR 10.7.

5 7. The issues presented in petition involve lengthy exposition of each public request  
6 submitted, the denial of the requests by the DMV, how such denials violated the Nevada Public  
7 Records Act, and all communications between the parties over the course of six months.

8 8. Based on the foregoing, Petitioner respectfully request leave to exceed the page count and  
9 the Court increase the total page count for the Petitioners' petition for a writ of mandamus to 28  
10 pages.

11 I declare under penalty of perjury under NRS 53.045 that the foregoing is true and correct.

12 DATED: August 15, 2025

13   
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