

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF KALAMAZOO

SABRINA PRITCHETT-EVANS and  
KIMBERLY HARRIS

Plaintiffs

Case No. 2023-0169-CZ

v.

HON. CURTIS J. BELL

REPUBLICAN PARTY OF KALAMAZOO  
COUNTY, STATE OF MICHIGAN (KGOP);  
KALAMAZOO GRAND OLD PARTY  
EXECUTIVE COMMITTEE (KGOPEC); and  
KELLY SACKETT

Defendants.

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James A. Thomas (P80931)  
JAMES A. THOMAS LAW OFFICES  
Attorney for Plaintiffs  
1925 Breton Rd., Suite 250  
Grand Rapids, MI 49506  
(616) 747-1188

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Matthew S. DePerno (P52622)  
DEPERNO LAW OFFICE, PLLC  
Attorney for Defendant Sackett  
Attorney for Defendants KGOP and KGOPEC  
*per limited appearance*  
951 W. Milham Avenue, PO Box 1595  
Portage, MI 49081  
(269) 321-5064

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**DEFENDANTS' MOTION TO FILE BRIEF IN EXCESS OF PAGE LIMIT**

Defendants REPUBLICAN PARTY OF KALAMAZOO COUNTY, STATE OF MICHIGAN ("KGOP"); KALAMAZOO GRAND OLD PARTY EXECUTIVE COMMITTEE ("KGOPEC"); and KELLY SACKETT ("Sackett"), by and through their attorney, DePERNO LAW OFFICE, PLLC, moves this Honorable Court for an order granting Defendants permission to file a brief in support to their motion for summary disposition in excess of the 20-page limit set forth in MCR 2.119(A)(2)(a). In support of such motion, Plaintiff stats as follows:

1. Defendants have filed a motion for summary disposition that is 26 pages in length.

2. The legal issues in this case requires an extended discussion of the facts and the law, along with an application of the law to the facts.

3. Defendants' attorney contacted Plaintiffs' attorney on February 14, 2019, who indicated that he will oppose this motion. See attached Exhibit 1. He stated "I will not concur with anything that you are doing."

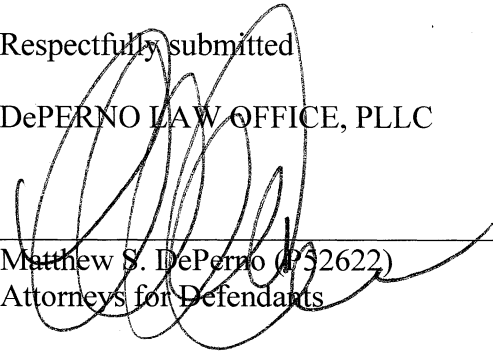
4. It is necessary to file a brief of this length because Plaintiff's attorney must response comprehensively to each of Plaintiffs' allegations in their 8-Count Complaint. The research into this brief has been extensive and detailed.

WHEREFORE, for the reasons stated herein, Defendants respectfully requests that this Honorable Court grant this motion.

Respectfully submitted

DePERNO LAW OFFICE, PLLC

Dated: April 28, 2023



Matthew S. DePerno (732622)  
Attorneys for Defendants

# **Exhibit 1**

Matthew DePerno <[matthew@depernolaw.com](mailto:matthew@depernolaw.com)>

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**Re: Pritchett-Evans et all v KGOP et al**

1 message

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**jimmy@jimmythomaslaw.com** <[jimmy@jimmythomaslaw.com](mailto:jimmy@jimmythomaslaw.com)>  
To: Matthew DePerno <[matthew@depernolaw.com](mailto:matthew@depernolaw.com)>

Fri, Apr 28, 2023 at 11:35 AM

Matt, I will not concur with anything that you are doing.

Sent from my iPhone

On Apr 28, 2023, at 11:26 AM, Matthew DePerno <[matthew@depernolaw.com](mailto:matthew@depernolaw.com)> wrote:

James,

Today I am filing Defendants' motion for summary disposition. My brief is 25 pages which is over the limit of 20 pages. Therefore I seek your concurrence in a motion I will also be filing to permit an expanded brief. Do you oppose my motion for expanded brief or can I state that the motion is unopposed?

Matthew S. DePerno  
DePERNO LAW OFFICE, PLLC

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