

No. 21-1786

United States Court of Appeals
for the Sixth Circuit

— | —

Timothy King, et al.,

Plaintiffs

v.

**Gretchen Whitmer, in her official capacity as
Governor of the State of Michigan, et al.,**

Defendants-Appellees.

— | —

Appeal from the United States District Court
Eastern District of Michigan
No. 2:20-cv-13134

Honorable Linda V. Parker, District Judge, Presiding

**Motion for Leave to File Oversized Opening Brief by Appellants
Sidney Powell, Howard Kleinhendler, Gregory Rohl, Julia Z.
Haller, Brandon Johnson, and Scott Hagerstrom**

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MOTION FOR LEAVE TO FILE OVERSIZED OPENING BRIEF

Appellants Sidney Powell, Howard Kleinhendler, Gregory Rohl, Julia Z. Haller, Brandon Johnson, and Scott Hagerstrom respectfully request leave to file the brief accompanying this motion, which contains a total of 17,681 words.

The proposed brief has fewer than 5000 more words than permitted as a matter of course, despite needing to address two District Court orders that total 35,171 words (137 pages) and aim, among other penalties, to have Appellants disbarred. RE 172; RE 179. The District Court record runs to 7185 pages. The issues presented by the underlying litigation and the sanctions orders are of significant public interest. They involve novel questions of law and an unprecedented set of sanctions. Several arguments depend upon extensive citations to the record, and the formatting requirements for such citations add significantly to the word count.

Appellants cannot fairly present the numerous issues they have for appeal within the default word limit. They therefore respectfully request the Court grant them leave to file the attached oversized brief.

Respectfully submitted:

Date: February 7, 2022

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CERTIFICATE OF COMPLIANCE

Pursuant to Fed. R. App. P. 27(d)(2)(A), I certify that the attached Motion for Leave to File Oversized Opening Brief is proportionately spaced, has a typeface of at least 14 points, including headings and footnotes, and contains 174 words.

DATED this 7th day of February 2022.

/s/ Sidney Powell
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is a member of the bar of this Court in good standing, and that the foregoing Motion for Leave to File Oversized Opening Brief was delivered via electronic service on this date to:

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I declare under the penalties of perjury that the foregoing is true and correct, and that this certificate was executed in Dallas, Texas, this 7th day of February 2022.

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