

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Michel DeGraff,

Plaintiff,

v.

Massachusetts Institute of Technology;
Tim Walberg in his official capacity as
the Chairman of the House Committee
on Education & Workforce; and
The House Committee on Education
& Workforce,

Defendants.

Case No. 1:26-cv-11488-ADB

**PLAINTIFF MICHEL DEGRAFF'S UNOPPOSED MOTION TO ALLOW
MEMORANDA OF UP TO TWENTY-FIVE PAGES
IN OPPOSITION TO DEFENDANT'S MOTION TO DISMISS**

Plaintiff Michel DeGraff respectfully moves for leave to file opposition memoranda of no more than twenty-five pages each in response to the motions to dismiss filed by Defendant Massachusetts Institute of Technology and by Defendants House Committee on Education & Workforce and Tim Walberg.

Counsel for Plaintiff has conferred with counsel for all Defendants pursuant to Local Rule 7.1(a)(2), and Defendants do not oppose this request.

Good cause exists for the requested relief. On May 7, 2026, and June 2, 2026, this Court granted requests by the Congressional Defendants and MIT, respectively, to file memoranda of up to twenty-five pages in support of their motions to dismiss. Plaintiff seeks only equal page limits for his opposition memoranda.

The requested enlargement is also warranted by the complexity of the issues presented. The motions to dismiss raise multiple distinct grounds, including Article III standing, state action, Speech or Debate immunity, First Amendment coercion under *NRA v. Vullo*, Rule 19, and leave to amend. Plaintiff requires additional pages to respond clearly and efficiently to these arguments without burdening the Court with unnecessary compression or fragmented briefing.

The requested enlargement is modest: from the ordinary twenty-page limit to twenty-five pages. It will promote fairness, permit Plaintiff to respond proportionately to Defendants' expanded memoranda, and assist the Court in resolving the Defendants' pending motions to dismiss.

WHEREFORE, Plaintiff respectfully requests that the Court enter an order permitting Plaintiff to file opposition memoranda of up to twenty-five pages each in opposition to Defendants' motions to dismiss.

Date: June 12, 2026

Respectfully submitted,

/s/ Jonathan Wallace
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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(a), I hereby certify that counsel for Plaintiff has conferred with counsel of record for all parties about the filing of this motion. As set forth above, counsel for Defendants indicated they do not oppose the relief sought.

/s/ Jonathan Wallace
Jonathan Wallace

CERTIFICATE OF SERVICE

I, Jonathan Wallace, hereby certify that a true copy of this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on June 11, 2026.

/s/ Jonathan Wallace
Jonathan Wallace