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IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE

STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

LAWRENCE P. MANLAPIT, JR., individually as father of LAWRENCE P. MANLAPIT, III, DECEASED,

Plaintiff,

VS.

KRUJEX FREIGHT TRANSPORT CORP.; KRUJEX TRANSPORTATION CORP.; KRUJEX TRANSPORTATION SYSTEMS. Lead Case No. CV01-19-06625 (Consolidated with Case Nos. CV01-19-23246, CV01-20-00653, CV01-20-02624, CV01-20-07803 and CV01-20-08172)

MANLAPIT/JOHNSON/WESTALL PLAINTIFFS' JOINT MOTION TO FILE OVERLENGTH BRIEFS IN SUPPORT OF JOINT MOTIONS FOR

MANLAPIT/JOHNSON/WESTALL PLAINTIFFS' JOINT MOTION TO FILE OVERLENGTH BRIEFS IN SUPPORT OF JOINT MOTIONS FOR LEAVE TO AMEND COMPLAINTS TO ADD A CLAIM FOR PUNITIVE DAMAGES – 1

LLC; KRUJEX LOGISTICS, INC.;
ALBERTSON'S COMPANIES;
CORNELIEU VISAN; DANIEL VISAN;
LIGRA VISAN; STATE OF IDAHO; STATE
OF IDAHO DEPARTMENT OF
TRANSPORTATION; IDAHO STATE
POLICE; PENHALL COMPANY;
PARAMETRIX, INC.; SPECIALTY
CONSTRUCTION SUPPLY LLC; and DOES
1 through 150, inclusive,

LEAVE TO AMEND COMPLAINTS TO ADD A CLAIM FOR PUNITIVE DAMAGES

Defendants.

AND ALL CONSOLIDATED ACTIONS.

COME NOW Plaintiffs Lawrence P. Manlapit, Jr. and Dorine E. Norko, individually and in their capacity as Co-Administrators of the Estate of Lawrence P. Manlapit, III, Plaintiff Daisy Johnson, and Plaintiffs Kimberly and Michael Westall ("Manlapit/Johnson/Westall Plaintiffs"), by and through their undersigned counsel, and hereby move this Honorable Court for an order allowing them to file overlength briefs in support of their *Joint Motion for Leave to Amend Complaints to Add a Claim for Punitive Damages Against Defendants Albertson's Companies and Krujex Freight Transport Corporation*, as well as in support of their *Joint Motion for Leave to Amend Complaints to Add a Claim for Punitive Damages Against Defendants Penhall Company and Specialty Construction Supply, LLC.*

Due to the complex nature of the litigation, significant amount of discovery that has been conducted and claims alleged by the Manlapit/Johnson/Westall Plaintiffs against these four defendants, the Manlapit/Johnson/Westall Plaintiffs request permission to file supporting memorandums that exceed the 25 page limit imposed by Local Rule 8.1. Good cause further exists on the grounds that the Manlapit/Johnson/Westall Plaintiffs have filed Joint Motions and Joint Memorandums as opposed to filing separate motions and supporting memorandums so as to not

burden the Court with multiple filings. Even though the Joint Memorandums exceed the 25 page limit imposed by Local Rule 8.1, the Manlapit/Johnson/Westall Plaintiffs believe they still contain fewer pages than the memorandums that would have been filed had each of them filed separately.

DATED this 6th day of July, 2021.

BAUM HEDLUND ARISTEI & GOLDMAN PC

By: /s/ Clay Robbins, III
Clay Robbins, III
-andKurt D. Holzer
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Estate of Lawrence P. Manlapit, III

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JOHNSON & MONTELEONE, LLP

By /s/ Jason R.N. Monteleone
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Attorneys for Plaintiffs Kimberly and Michael
Westall