

KERLEY, WALSH, MATERA & CINQUEMANI, P.C.

BRIAN P. KERLEY
JEFFREY G. WALSH
ROSEMARY CINQUEMANI
GLENN J. MATERA
JEFFREY M. Di LUCCIO
PATRICK J. SHELLEY
STEPHEN E. RACH II
ROBERT K. LAPPING
TIMOTHY M. SHELLEY
KERRI E. LEVY
MICHAEL JANES
HEATHER L. AQUINO**
BRETT J. MILGRIM
ARGIRO DRAKOS
STEPHANIE A. JOHNSTON
CARL J. SCHAEERF**
CAROL N. KOTSINIS**
GARY N. SMITH***
STEVEN J. KIM*

2174 JACKSON AVENUE
SEAFORD, NEW YORK 11783
(516) 409-6200
FAX (516) 409-8288

200 SHEFFIELD STREET, SUITE 208
MOUNTAINSIDE, NEW JERSEY 07092
555 FIFTH AVENUE, 14TH FLOOR
NEW YORK, NY 10017

*REMIT ALL RESPONSES TO THE
SEAFORD OFFICE

FARIJE FREILICH
ANGELA M. SANTORUFO
JOY WODA SCHNEIDER
**JOHN P. IANNONE, JR.
**JONATHAN R. JANOFSKY
MICHAEL A. GRAZIO
ROBERT O. PRITCHARD
VANESSA M. COSTANTINO
ZACHARY S. GOLDMAN
*MORGAN J. WILLIAMS

OF COUNSEL
KATHLEEN LINDSAY, R.N.
*THOMAS J. DECKER
KRISTEN SPOEREL

*Admitted in NJ

**Admitted in NY and NJ

***Admitted in NY, NJ and PA

January 22, 2026

Via ECF

The Honorable Nelson S. Roman
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: STELLA CRISTINA GOMES DE SOUZA v. WATCHTOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA, INC.

Civil Action No. 7:25-cv-09458-NSR/ Our file: 27208

Dear Judge Roman:

Our firm represents the individual members of the Governing Body of Jehovah's Witnesses ("Governing Body") in the captioned matter. We write this letter in brief opposition to plaintiff's letter for an expanded page limit.

Our brief is a mere 17 pages of argument. Co-defendants' brief makes many of the same arguments as we do, in similarly concise fashion. We do not see the need for a consolidated opposing brief, and certainly not for a 33 page consolidated opposing brief.

We indicated that we would consent if this were the last request. We've gone through a lot of effort and expense to respond to this pleading, which we contend, and believe we have demonstrated, is lengthy but utterly lacking in merit. Length is not a surrogate for merit, as both

defendants' terse submissions hopefully serve to demonstrate. Plaintiff, who filed 148 paragraphs of complaint, totaling 33 pages, apparently intends to do something similar in opposition. It is not warranted.

We do not want to face further applications, changes to the record or other cost raising endeavors. Fed.R.Civ.P. 1 is all about cost control. If our adversary's application is granted, it should be the last application made. But it ought to be denied. It is utterly unnecessary.

Thank you for your kind attention to this matter.

Respectfully,

KERLEY, WALSH, MATERA & CINQUEMANI, P.C.



By: Carl J. Schaerf, Esq. (CS 5031)
Attorneys for The Governing Body of Jehovah's Witnesses
CSchaerf@kerleywalsh.com

cc: All appearing counsel by ECF