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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.

A handwritten signature in cursive script, reading "Carl Schaerf", is positioned above a horizontal line. The signature is contained within a rectangular box that is part of a larger signature block.

By: Carl J. Schaerf, Esq. (CS 5031)

Attorneys for The Governing Body of Jehovah's
Witnesses

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cc: All appearing counsel by ECF