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January 22, 2026

By ECF

Hon. Nelson S. Román  
United States District Judge  
United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601

**Re: Response to Plaintiff's Motion for Leave to File Excess Pages**

*Gomes De Souza v. Watchtower Bible and Tract Society of Pennsylvania, Inc. et al*  
Case No.: 7:25-cv-09458-NSR

Dear Judge Román,

Our firm represents defendants Watchtower Bible and Tract Society of Pennsylvania, Inc. ("WTPA") and Watchtower Bible and Tract Society of New York, Inc. ("WTNY"). In response to Plaintiff's application for leave to file a memorandum of law exceeding the page limit set forth in Your Honor's individual practice rules, *see* ECF Dkt. No. 33, we respectfully adopt the position and arguments set forth by counsel for co-defendant Governing Body of Jehovah's Witnesses their letter filed at ECF Dkt. No 34.

Respectfully submitted,

FEINBERG & GASBARRO, LLP



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Jeffrey W. Gasbarro

*Counsel for Watchtower Bible and Tract Society of  
Pennsylvania, Inc. and Watchtower Bible and Tract  
Society of New York, Inc.*

CC: All parties by ECF