

# In the Supreme Court of the United States

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MIRIAM FULD, ET AL.,

*Petitioners,*

*v.*

PALESTINE LIBERATION ORGANIZATION, ET AL.,

*Respondents.*

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UNITED STATES OF AMERICA,

*Petitioner,*

*v.*

PALESTINE LIBERATION ORGANIZATION, ET AL.,

*Respondents.*

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ON WRIT OF CERTIORARI TO THE  
UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

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## OPPOSITION TO APPLICATION TO FILE OVERSIZED BRIEF

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Petitioners in *Fuld v. Palestine Liberation Organization*, No. 24-20, respectfully oppose Respondents’ application to file a merits brief exceeding the 13,000-word limit. The motion is governed by Rule 33.1(d), which provides that, “[f]or good cause, the Court or a Justice may grant leave to file a document in excess of the word limits, but application for such leave is not favored.”

Respondents begin from the false premise that, absent an enlargement of the word limit, they would be entitled to “file two separate briefs on the merits totaling 26,000 words.” App. ¶ 3. On December 6, the Court issued a docket order “consolidat[ing] these cases for briefing and oral argument.” Under Rule 25.2, therefore, Respondents must file a single “brief on the merits,” which must comply with the 13,000-word limit.

Respondents have not shown good cause for an enlargement of the word limit here. The Court’s standard practice is for parties on the same side of a case to file a single brief. While separate briefs are sometimes permitted for parties with separate institutional interests—most typically for the United States—the filing of a separate brief by the United States is not normally treated as a justification by the opposing party to deviate from the standard practice. Nor is a party’s perceived need to address “amicus curiae briefs.” App. ¶ 2.

In arguing that the Court “regularly grants” applications to enlarge the word limit, App. ¶ 5, Respondents identify only six cases in which such a request was granted in the past seventeen years, and all or nearly all of them involved multiple questions presented. In addition, in none of the cases did the application appear to have been opposed.

Respondents' application should be denied.

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