IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

OTO ANALYTICS, LLC, Plaintiff, v. BENWORTH CAPITAL PARTNERS PR LLC, BENWORTH CAPITAL PARTNERS LLC, BERNARDO NAVARRO and CLAUDIA NAVARRO, Defendants.	Civil No. 23-01034 (GMM)

MOTION FOR LEAVE TO FILE *MOTION TO INTERVENE UNDER FED. R. CIV. P.24* IN EXCESS OF PAGE LIMIT IMPOSED BY LOCAL RULE 7(e)

TO THE HON. GINA MÉNDEZ MIRÓ
UNITED STATES DISTRICT COURT JUDGE:

COMES NOW the Federal Reserve Bank of San Francisco (the "Reserve Bank"), by and through its undersigned legal counsel, and respectfully requests that this Court grant it permission to file its *Motion to Intervene Under Fed. R. Civ. P. 24* (the "Motion")[1] in excess of the page limit imposed by Local Rule 7(e). In support thereof, the Reserve Bank states and requests as follows:

1. Today, the Reserve Bank filed the Motion requesting permission to intervene in this action initiated by Oto Analytics, LLC, as allowed by Rule 24(a)(2) or, in the alternative, Rule 24(b) of the Federal Rules of Civil Procedure. *See* ECF No. 127.

2. Despite the undersigned counsel's best efforts to comply with the fifteen (15) page limit imposed by Local Rule 7(e), the Motion is twenty-two (22) pages long, excluding the

[1] Capitalized terms used but not defined herein have the meaning ascribed to them in the Motion.

signature block. Twelve (12) pages provide a detailed account of the facts that the Reserve Bank asserts are relevant to support its request and demonstrate, among other things: (1) its interest in the property and transactions that are subject of this action; (2) the potential impairment of its interests by this Court's disposition of the action; and (3) the inadequate representation of its interests by any current party in this case. The remaining ten (10) pages of the Motion include the introduction, a summary of applicable law, and the legal arguments supporting the Reserve Bank's request to intervene. *Id.*

3. The Reserve Bank respectfully asserts that the excess pages are necessary for it to provide both the full background of the complex relationship between the Reserve Bank, Benworth and the pending action filed by Womply, and to establish the factual and legal basis for the relief sought by the Motion.

WHEREFORE, the Reserve Bank respectfully requests that, for the reasons shown herein, this Honorable Court grant it leave to file the Motion consisting of seven (7) pages in excess of the limit imposed by Local Rule 7(e), for it to be able to develop at length the factual background supporting its request to intervene and the legal arguments related thereto.

Dated: July 10, 2024 Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on July 10, 2024, I filed a copy of the foregoing document using the Court's CM/ECF system, which will automatically generate a Notice of Electronic Filing to all counsel of record in this matter.

s/ Aníbal A. Román Medina
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