

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

LARRY E. KLAYMAN, CHARLES  
STRANGE, and MARY ANNE STRANGE,  
on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

BARACK HUSSEIN OBAMA,  
ERIC HIMPTON HOLDER, JR.,  
KEITH B. ALEXANDER, LOWELL C.  
MCADAM, ROGER VINSON,  
VERIZON COMMUNICATIONS,  
NATIONAL SECURITY AGENCY, and  
U.S. DEPARTMENT OF JUSTICE,

Defendants.

No. 1:13-cv-00851-RJL

**EXPEDITED MOTION OF DEFENDANT LOWELL C. MCADAM FOR AN  
EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' AMENDED COMPLAINT**

Defendant Lowell C. McAdam, the Chief Executive Officer of Defendant Verizon Communications Inc.,<sup>1</sup> respectfully moves for an extension of time to file a motion to dismiss Plaintiffs' Class Action Amended Complaint under Federal Rule of Civil Procedure 12(b) or to answer the amended complaint. The federal government defendants have indicated that the deadline for their response to Plaintiffs' amended complaint is December 2, 2013, and on October 15, 2013, this Court granted Defendant Verizon Communications Inc.'s motion to

---

<sup>1</sup> Defendant McAdam does not reside in in this district and is not alleged to have taken any action in or affecting this district. Verizon therefore reserves the right to challenge personal jurisdiction over Defendant McAdam in its response to Plaintiffs' amended complaint. Verizon does not, by seeking this extension of time, concede personal jurisdiction over Defendant McAdam.

extend its deadline to respond to the amended complaint to December 2, 2013. It now appears that a copy of Plaintiffs' amended complaint sent by certified mail to Mr. McAdam was received at Verizon Communications Inc. on September 30, 2013, but was not forwarded to Mr. McAdam's office until today. In the unlikely event that service were treated as having been effected on September 30, 2013, Mr. McAdam's response could be due as early as **Monday, October 21, 2013**. An extension of time for Mr. McAdam is necessary to align the deadlines for all of the defendants to respond to the amended complaint.

Pursuant to Local Civil Rule 7(m), undersigned counsel conferred with counsel for Plaintiffs and counsel for the federal government defendants regarding this motion. Counsel for the federal government defendants does not oppose the requested extension. Counsel for Plaintiffs opposes the requested extension. Mr. McAdam has not previously requested or obtained an extension of time in this matter.

We respectfully request that the Court expedite consideration of this motion.

Dated: October 17, 2013

Respectfully submitted,

/s/ Randolph D. Moss

Randolph D. Moss (D.C. Bar No. 417749)  
Brian M. Boynton (D.C. Bar. No. 483187)  
WILMER CUTLER PICKERING HALE AND DORR LLP  
1875 Pennsylvania Avenue, NW  
Washington, DC 20006  
Tel.: (202) 663-6000  
Fax: (202) 663-6363  
[randolph.moss@wilmerhale.com](mailto:randolph.moss@wilmerhale.com)

*Counsel for Lowell C. McAdam*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 17, 2013, I filed the foregoing document with the Clerk of Court for the United States District Court for the District of Columbia using the Court's CM/ECF system, which caused notice of the filing to be served upon all counsel of record.

/s/ Randolph D. Moss

Randolph D. Moss