

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

LARRY KLAYMAN, *et. al*

Plaintiffs,

v.

BARACK HUSSEIN OBAMA II, *et. al*

Defendants.

Civil Action No. 13-CV-851

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Fed. R. Civ. P. 65 and LCvR 65.1, the above named Plaintiffs hereby move for a preliminary injunction that, during the pendency of this suit, (i) bars Defendants from collecting Plaintiffs' call records under the mass call surveillance program; (ii) requires Defendants to destroy all of Plaintiffs' call records already collected under the program; and (iii) prohibits Defendants from querying metadata obtained through the program using any phone number or other identifier associated with Plaintiffs for the reasons set forth in the accompanying memorandum of law, and such other relief as may be found just and proper, as set forth in the accompanying Plaintiffs' Memorandum of Points and Authorities.

Plaintiffs' counsel conferred with Defendants' counsel on October 24, 2013, concerning this motion. Defendants' counsel indicated that they oppose this motion.

Dated: October 28, 2013

Respectfully submitted,

/s/ Larry Klayman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of October, 2013 a true and correct copy of the foregoing Motion for Preliminary Injunction (Civil Action No. 13-cv- 851) was submitted electronically to the District Court for the District of Columbia and served via CM/ECF upon the following:

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