

**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 RJL

**MOTION FOR EXTENSION OF TIME TO CERTIFY CLASS ACTION**

Plaintiffs hereby move this court for an extension of time of ten (10) days to file a motion moving for class certification in the above styled lawsuit and as grounds therefor would show:

1. Plaintiffs filed suit challenging on Constitutional grounds the legality of Defendants' participation and conduct in a secret and illicit government scheme to intercept and analyze vast quantities of domestic telephonic communications.
2. Plaintiffs have been engaged in a heavy period of litigation. Due to the press of business, and the large amount of work that went into preparing the Plaintiffs' Motion for Preliminary Injunction (filed on the previous day to this motion), the Plaintiffs have been unable to fully research draft a motion for class certification.
3. In addition, every day new information is coming to light that shows, among other things, how the National Security Agency has been lying to this Court and the American public about what information is being gathered and monitored and the extent to which the American people are being spied upon by their own government.

4. Because of all the uncertainty and the new information that has come to light the Plaintiffs are still in the process of determining the different defined classes that will be part of this lawsuit.
5. A short extension of ten days will allow the Plaintiff to gather the information needed to prepare and file a motion to certify this lawsuit as a class action.
6. No prejudice will result to the Defendants, as they have yet to file responsive pleadings.
7. Defendants have not granted consent to this motion.

WHEREFORE, Plaintiffs respectfully move for an additional ten (10) days to move for certification of a class action in the above styled lawsuit on or by November 12, 2013.

Dated: October 29, 2013

Respectfully submitted,

/s/ Larry Klayman \_\_\_\_\_

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of October, 2012 a true and correct copy of the foregoing Motion for Extension of Time to Certify Class Action (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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Respectfully submitted,  
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