

**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

MOTION FOR LEAVE TO APPEAR TELEPHONICALLY

Plaintiffs, Larry Klayman, and Charles and Mary Ann Strange, hereby respectfully request that this Court grant leave for their counsel to appear telephonically and as grounds therefor would show:

1. On October 29, 2013 this Court set a Status Conference to be held on October 31, 2013 at 3:45 pm in courtroom 18.
2. Mr. Klayman is currently located in Los Angeles, CA.
3. Due to the short amount of time before the scheduled Status Conference, and because of pre-existing obligations in Los Angeles, Mr. Klayman will have an extremely difficult time traveling back to Washington, D.C. in time for the Status Conference.
4. It is Mr. Klayman's understanding that appearing telephonically is possible within this District Court.
5. An appearance telephonically by Mr. Klayman would not prejudice either party.
6. On October 30, 2013 Plaintiffs contacted Defendants' counsel to seek consent for this motion. Mr. Whitman advised the Plaintiffs that he is no longer representing the

government and that Plaintiffs should contact Mr. Gilligan but that he did not foresee Mr. Gilligan having a problem consenting to this motion. Plaintiffs then attempted to contact Mr. Gilligan but have not as of yet heard back from him. Plaintiffs will update the Court of the Defendants' decision once they hear from Mr. Gilligan.

WHEREFORE, Plaintiffs respectfully request that this Court allow leave for Plaintiffs' counsel to appear telephonically at the Status Conference of October 31, 2013.

Dated: October 30, 2013

Respectfully submitted,

/s/ Larry Klayman
Larry Klayman, Esq.
Attorney at Law
D.C. Bar No. 334581
2020 Pennsylvania Ave. NW, Suite 800
Washington, DC 20006
Tel: (310) 595-0800
Email: leklayman@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of October, 2012 a true and correct copy of the foregoing Motion For Leave To Appear Telephonically (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:

James R. Whitman
U.S. DEPARTMENT OF JUSTICE
P.O. Box 7146
Washington, DC 20044
(202) 616-4169
Fax: 202-616-4314
Email: james.whitman@usdoj.gov

James J. Gilligan
Special Litigation Counsel
Civil Division, Federal Programs Branch
U.S. Department of Justice
P.O. Box 883
Washington, D.C. 20044
(202) 514-3358
Email: James.Gilligan@usdoj.gov

Randolph D. Moss
WILMER CUTLER PICKERING HALE & DORR LLP
1875 Pennsylvania Avenue, NW
Washington, DC 20006
(202) 663-6640
Fax: (202) 663-6363
Email: randolph.moss@wilmerhale.com

Attorneys for Defendants.

Respectfully submitted,

/s/ Larry Klayman

Larry Klayman, Esq.
D.C. Bar No. 334581
Klayman Law Firm
2020 Pennsylvania Ave. NW, Suite 345
Washington, DC 20006
Tel: (310) 595-0800