

**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 RECONSIDERATION OF PLAINTIFFS' MOTION FOR
CONTINUANCE OF AND TO RESET STATUS CONFERENCE CONCERNING
PRELIMINARY INJUNCTION MOTION**

Plaintiffs, Larry Klayman, and Charles and Mary Ann Strange, hereby move this Court to reconsider its denial of Plaintiffs' Motion to Continue the Status Conference of October 31, 2013 to November 4th or 5th, 2013, or whenever the Court deems appropriate, 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. Mr. Klayman's associate spoke with Mr. Sloan within this Court's office who was then advised of Mr. Klayman's current location in Los Angeles, CA. See Exhibit 1. Mr. Sloan advised that Mr. Klayman could move to appear telephonically or could then move to continue the status conference.
4. On October 30, 2013, after the Court denied Mr. Klayman's motion to appear telephonically, Plaintiffs moved for a short continuance of the Status Conference until

Monday or Tuesday of the following week (or whenever the Court deemed appropriate) because of Mr. Klayman's location in Los Angeles with pre-scheduled commitments.

5. On October 31, 2013, this Court denied Plaintiffs' Motion for Continuance at approximately 12:00 -12:30pm Eastern time, with a little over three hours remaining before the Status Conference was set to begin at 3:45 pm.
6. At this particular time it is a physical impossibility for Mr. Klayman to travel to Washington D.C., a flight of nearly five hours from Los Angeles even if he could hop a plane immediately (six hours including travel to/from the airport), in time for the Status Conference which is a mere three hours away.
7. A short continuance until Monday or Tuesday, November 4th or 5th, or whenever the Court deems it appropriate, will allow Mr. Klayman to travel back to Washington, D.C. and attend the Status Conference.
8. Mr. Klayman's associate spoke with Mr. Sloan from this Court's chambers who indicated that a motion for continuance could be filed and granted if Mr. Klayman could not make it to the Status Conference.
9. Plaintiffs contacted Defendants' counsel, Jim Gilligan, Esq., to seek consent for this motion. The government Defendants do not object to this motion seeking a continuance.
10. Neither party will be prejudiced as a result of this short continuance.

WHEREFORE, Plaintiffs respectfully request that this Court reconsider its decision of October 31, 2013 and continue the Status Conference currently set for October 31, 2013 to November 4th or 5th, 2013, or any other time this Court deems it appropriate.

Dated: October 31, 2013

Respectfully submitted,

/s/ Larry Klayman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 31st day of October, 2012 a true and correct copy of the foregoing Motion for Reconsideration (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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