

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

LARRY KLAYMAN, *et. al*

Plaintiffs,

v.

BARACK HUSSEIN OBAMA II, *et. al*

Civil Action No. 13-cv- 851 RJL

Defendants.

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 and other matters related to the hearing of November 18, 2013, the Plaintiffs have been unable to fully research draft a motion for class certification.
3. 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.
4. No prejudice will result to the Defendants, as they have yet to file responsive pleadings.
5. 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 26, 2013.

Dated: November 12, 2013

Respectfully submitted,

/s/ Larry Klayman _____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 12th day of November, 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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