

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

LARRY KLAYMAN, *et. al*

Plaintiffs,

v.

BARACK HUSSEIN OBAMA II, *et. al*

Defendants.

Civil Action Nos. 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. On November 18, 2013 a hearing was held in the above styled lawsuit, during which this Court granted the parties the opportunity to submit additional briefing related to the preliminary injunction. This briefing is due on November 26, 2013, the same day during which the Plaintiffs requested their motion to certify their class would be due
3. A short extension of 10 days will allow the Plaintiffs the opportunity to prepare the motion to certify the classes in these proceedings.
4. No prejudice will result to the Defendants.
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 December 10, 2013.

Dated: November 25, 2013

Respectfully submitted,

/s/ Larry Klayman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of November, 2013 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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