

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

LARRY E. KLAYMAN, CHARLES
STRANGE, and MARY ANNE STRANGE,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

BARACK HUSSEIN OBAMA,
ERIC HIMPTON HOLDER, JR.,
KEITH B. ALEXANDER, LOWELL C.
MCADAM, ROGER VINSON,
VERIZON COMMUNICATIONS,
NATIONAL SECURITY AGENCY, and
U.S. DEPARTMENT OF JUSTICE,

Defendants.

No. 1:13-cv-00851-RJL

**VERIZON DEFENDANTS' OPPOSITION TO PLAINTIFFS'
FOURTH MOTION FOR EXTENSION OF TIME TO CERTIFY CLASS ACTION**

The Verizon defendants¹ respectfully oppose Plaintiffs' fourth Motion for Extension of Time To Certify Class Action (Dkt. No. 40) for the same reasons Verizon opposed Plaintiffs' initial motion for an extension. *See* Verizon Communications Inc.'s Opp'n to Pls.' Mot. for Extension of Time To Certify Class Action (Dkt. No. 11).

¹ There is no personal jurisdiction over the Verizon defendants in this district. The Verizon defendants therefore reserve the right to challenge personal jurisdiction in their response to Plaintiffs' amended complaint. The Verizon defendants do not, by opposing Plaintiffs' procedural motion, concede personal jurisdiction.

Dated: November 30, 2013

Respectfully submitted,

/s/ Brian M. Boynton

Randolph D. Moss (D.C. Bar No. 417749)
Brian M. Boynton (D.C. Bar. No. 483187)
WILMER CUTLER PICKERING HALE AND DORR LLP
1875 Pennsylvania Avenue, NW
Washington, DC 20006
Tel.: (202) 663-6000
Fax: (202) 663-6363
randolph.moss@wilmerhale.com

Counsel for the Verizon Defendants

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2013, I filed the foregoing document with the Clerk of Court for the United States District Court for the District of Columbia using the Court's CM/ECF system, which caused notice of the filing to be served upon all counsel of record.

/s/ Brian M. Boynton
Brian M. Boynton