

**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

PLAINTIFFS' MOTION FOR EXTENSION OF TIME

Plaintiffs hereby move for an extension of fourteen (14) days to file an opposition to the Defendants' motion to dismiss and as grounds therefor would show:

1. On December 16, 2013 the government Defendants and the Verizon Defendants filed their respective motions to dismiss in the above styled lawsuit.
2. The response for both motions to dismiss are currently set for January 2, 2013, the day after the New Years holiday.
3. During this holiday period Plaintiff Klayman's office is short staffed. In addition to the already shortened resources, one of Plaintiff's colleagues has been ill and the office has been inundated with the press of business during the time in which the oppositions to the Defendants' motions would be due.
4. A short extension of two weeks would enable Plaintiff Klayman's office to return to full strength and allow them the opportunity to fully research and brief an opposition to the Defendants' motions.

5. Pursuant to Local Rule 7(m), the Plaintiffs conferred with counsel for the Defendants regarding the relief they seek in this motion. **The government Defendants have indicated that they consent to this motion. The Verizon Defendants have indicated that they do not object to this motion.**

WHEREFORE, Plaintiffs respectfully requests an extension of fourteen days or until January 16, 2013 to file a response to Defendants' motion to dismiss.

Dated: December 24, 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 24th day of December a true and correct copy of the foregoing Plaintiffs' Motion for Extension of Time (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 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