

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

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LARRY KLAYMAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	Civil Action No.
)	1:13-cv-00851-RJL
v.)	
)	
BARACK OBAMA, President of the)	
United States, <i>et al.</i> ,)	
)	
Defendants.)	
<hr/>)	
LARRY KLAYMAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	Civil Action No.
)	1:13-cv-00881-RJL
v.)	
)	
BARACK OBAMA, President of the)	
United States, <i>et al.</i> ,)	
)	
Defendants.)	
<hr/>)	

[PROPOSED] ORDER

The above-captioned cases are before the Court on the motion of defendants Barack Obama, President of the United States, Eric Holder, Attorney General of the United States, and General Keith B. Alexander, Director of the National Security Agency (NSA), insofar as they are sued in their official capacities, together with defendants NSA and the United States Department of Justice (collectively, the “Government Defendants”), for a stay of proceedings against them pending their appeal of this Court’s December 16, 2013, preliminary injunction issued in case no. 13-cv-851.

The Court having considered the Government Defendants’ submissions in support of their motion and any submissions in opposition thereto,

IT IS HEREBY ORDERED THAT:

1. The Government Defendants' motion is hereby GRANTED.
2. All proceedings against the Government Defendants in the above-captioned actions are hereby STAYED pending the Government Defendants' appeal to the United States Court of Appeals for the District of Columbia Circuit from this Court's December 16, 2013, preliminary injunction in case no. 13-cv-851.

So ORDERED this _____ day of _____, 2014.

HON. RICHARD J. LEON
UNITED STATES DISTRICT JUDGE