

**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 Nos. 13-cv-851  
and  
13-cv-881

**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. Plaintiffs previously moved this Court for an extension until January 16, 2014 to respond to the Defendants' motions.
3. On January 10, 2014 the government Defendants moved to stay these proceedings pending the appeal.
4. Counsel for Plaintiffs had to use considerable time recently to prepare an opposition to the government NSA Defendants motion to stay. Opposition to this motion is crucial to expeditiously move this case into the discovery phase and ultimately to trial, as constitutional rights continue to be violated. He has also had to address some urgent matters in other cases, and thus needs addition time to respond to the subject motions to dismiss.

5. A short extension of fourteen (14) days would enable Plaintiffs to fully research and brief an opposition to the Defendants' motions.
6. 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 consent to this motion.

WHEREFORE, Plaintiffs respectfully requests an extension of fourteen days or until January 30, 2014 to file a response to Defendants' motion to dismiss.

Dated: January 16, 2014

Respectfully submitted,

/s/ Larry Klayman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of January a true and correct copy of the foregoing Plaintiffs' Motion for Extension of Time (Civil Action Nos. 13-cv- 851 and 13-cv-881) 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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