

**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' PRAECIPE**

Plaintiffs Larry Klayman, Charles and Mary Ann Strange, Matt Garrison, and Michael Ferrari, hereby file the attached pleading (Exhibit 1) with the Court, showing, as predicted, that the Obama Justice Department is doing everything it can to slow down its appeal before the U.S. Court of Appeals for the District of Columbia Circuit. Specifically, they come up with an unsubstantiated -- if not bogus -- claim that because President Barack Obama gave a speech offering to modify the NSA surveillance programs that the appeals should somehow be delayed *two months* from February 27, 2014 to April 28, 2014 with regard to the deadline to file their dispositive motions.

As Plaintiffs have represented to this Court, and as this Court itself has observed, these obvious delay tactics come as no surprise. In effect, the Obama Justice Department and the Defendants are flouting the Court's admonition in its order of December 16, 2013 which directed the Defendants to move their appeal quickly, given the Court's gracious stay of its order.

Dated: February 25, 2014

Respectfully submitted,

/s/ Larry Klayman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of February, 2014 a true and correct copy of the foregoing Plaintiffs' Praecipe (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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