

**IN THE 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 RJL

**PLAINTIFFS' REPLY TO GOVERNMENT DEFENDANTS' OPPOSITION TO  
PLAINTIFFS' MOTION TO STRIKE GOVERNMENT DEFENDANTS' ANSWER TO  
PLAINTIFFS' THIRD AMENDED COMPLAINT**

Plaintiffs, Larry Klayman, Charles Strange and Mary Ann Strange, hereby file their Reply to Government Defendants' Opposition to Plaintiffs' Motion to Strike Government Defendants' Answer to Plaintiffs' Third Amended Complaint.

Defendants' opposition is an affront not just to the Plaintiffs and millions of American citizens whose telephonic metadata has been illegally and unconstitutionally obtained and accessed by the Government Defendants, but also this Court.

By unilaterally deciding not to admit or deny portions of the Third Amended Complaint, claiming falsely and without invoking any legitimate privilege, the Government Defendants are saying that they do not trust this Court to safeguard alleged national security information. This Court has a national security clearance and it would be a gross understatement to argue that it is infinitely more trustworthy to guard national security information than even the Director of National Intelligence, James Clapper, who perjured himself before Congress and the other less

than truthful officials of the NSA and the other Government Defendants. Plain and simple, Plaintiffs' motion to strike is predicated on the Government Defendants having obstructed justice by on their own arrogantly deciding what needed to be answered or not. They can simply file two answers, one for the public file and one in camera for the Court. Of course, the Government Defendants' opposition does not address this proposed easy solution to their obstruction, and would rather defy this Court and continue to cover-up material facts relevant to this case. This conduct is more than scandalous, as set forth in Federal Rule of Civil Procedure Rule 12(f), as a reason to strike their pleading and as the Government Defendants concede, at a minimum, their affirmative defenses.

Plaintiffs do not need to belabor their legal and common sense arguments. This Court can see through the continued obstruction of the Government Defendants.

They should be ordered to respond fully to the Third Amended Complaint, or have their deficient, dishonest and obstructionist answer stricken, as well as all affirmative defenses stricken. The Government Defendants cannot and should not be able with impunity to act as if they are above the law, as much severe damage has already been done with their illegal, and as this Court found "almost Orwellian", unconstitutional acts.

Dated: March 14, 2013

Respectfully submitted,

/s/ Larry Klayman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of March, 2014 a true and correct copy of the foregoing Plaintiffs' Reply To Government Defendants' Opposition To Plaintiffs' Motion To Strike Government Defendants' Answer To Plaintiffs' Third Amended Complaint (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:

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Respectfully submitted,

/s/ Larry Klayman

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