

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

JOSEPH ARPAIO,

Plaintiff,

v.

BARACK OBAMA, ET AL.

Defendants.

Case 1:14-cv-01966

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY**

Plaintiff, Joseph Arpaio, hereby moves for an extension of three (3) hours to file his Reply to Defendants' Opposition to Motion for Preliminary Injunction and as grounds therefor would show:

1. On December 16, 2014 this Court ordered that Plaintiff may file a Reply to Defendants' Opposition to Motion for Preliminary Injunction and granted Plaintiff until the close of business, 5:00 p.m. Eastern Standard Time, to file this Reply.
2. Plaintiff's counsel is currently located on the West Coast and will be located there until he travels back to the District of Columbia for the hearing currently scheduled on December 22, 2014.
3. Plaintiff's counsel would lose three (3) business hours with the current deadline as he is currently on Pacific Standard Time.

4. A short extension of three (3) hours would allow the deadline for filing the Reply to coincide with the close of business, 5:00 p.m., where Plaintiff's counsel is currently located.
5. Neither party will be prejudiced as a result of this extension.
6. **Defendants' counsel indicated that Defendants will not oppose this motion.**

WHEREFORE, for the foregoing reasons Plaintiff hereby respectfully requests a short extension of three (3) hours, or until 5:00 p.m. Pacific Standard Time, to file his Reply to Defendants' Opposition to Motion for Preliminary Injunction.

Dated: December 17, 2014

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

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 17<sup>th</sup> day of December, 2014 a true and correct copy of the foregoing Unopposed Motion for Extension of Time (Civil Action Nos. 14-cv-1966) 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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**[PROPOSED] ORDER**

Upon consideration of Plaintiff's Motion for Extension of Time, the Court, having considered same, and all papers and argument in connection therewith, finds as follows:

IT IS HEREBY:

**ORDERED:** that the Plaintiff's Motion for Extension of Time is hereby **GRANTED**.

Plaintiff shall until 5:00 p.m. Pacific Standard Time to file a Reply to Defendants' Opposition to Motion for Preliminary Injunction.

Entered this \_\_\_\_\_ day of \_\_\_\_\_, 2014.

SO ORDERED,

\_\_\_\_\_  
Hon. Beryl A. Howell  
U.S. District Court Judge