

**IN UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 13-20610-CIV-ALTONAGA/Simonton

LARRY KLAYMAN,

Plaintiff,

v.

JUDICIAL WATCH, et. al.

Defendants.
_____ /

**MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Plaintiff, Larry Klayman, hereby moves pursuant to Rules 4(m) and 6(b)(1) of the Federal Rules of Civil Procedure, for an extension of time of 30 days to file a response to Defendants' Motion for Summary Judgment and as grounds therefore would show:

1. On December 19, 2013 Plaintiff sought consent to this motion from Defendants' counsel. Defendants have not responded to Plaintiff's request as of the time of the filing.
2. On December 5, 2013, the Defendants moved for Summary Judgment in the above styled lawsuit.
3. The current deadline to respond to Defendant's Motion for Summary Judgment is December 23, 2013.
4. Plaintiff is representing himself pro se in this lawsuit.

5. Due to the holiday season, and the press of business during a time in which Plaintiff is short on resources, Plaintiff respectfully requests additional time to research and draft a response in opposition to Defendants' Motion for Summary Judgment.
6. An extension of 30 days would allow for the Plaintiff to fully research and oppose Defendants' Motion for Summary Judgment.
7. Neither party will be harmed nor prejudiced as a result of this modest extension.

WHEREFORE, Plaintiff Larry Klayman respectfully requests that this Court grant an extension of 30 days, or until January 22, 2014, to file a response to Defendants' Motion for Summary Judgment.

Dated: December 20, 2013

Respectfully submitted,

/s/ Larry Klayman

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Plaintiff Pro Se

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 20, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF filing system. I also certify that the foregoing document is being served this date on all counsel of record or pro se parties on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by the CM/ECF system or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Larry Klayman

LARRY KLAYMAN

Plaintiff Pro Se

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VIA CM/ECF