

**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.

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CONSENT MOTION FOR EXTENSION OF TIME

Plaintiff, Larry Klayman, hereby respectfully requests an extension of ten (10) days, or until January 24, 2014, to respond to Defendant's discovery requests.

On December 12, 2013, Defendant Judicial Watch purportedly<sup>1</sup> served, by mail, on Plaintiff Defendant's First Set of Interrogatories, First Set of Request for Admissions, and First Set of Request for Production of Documents.

The deadline to respond to Defendant's discovery is currently January 16, 2014 (including 3 days for presumed mail service). Due to the press of business, including oral arguments in *Dean v. NBC Universal* (No. 12-cv-2002, D.C.C.A.), and the holiday season which kept Plaintiff out of his office for much of the weeks prior to this deadline, along with multiple filing deadlines (including a response to Defendant's Motion for Summary Judgment on January 9, 2014), Plaintiff has been unable to respond to Defendant's multiple discovery requests.

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<sup>1</sup> Plaintiff did not receive the Defendant's discovery by mail for some reason.

Plaintiff thereby respectfully requests an additional ten (10) days to respond to Defendant's discovery requests. A short extension will not prejudice either party.

**Defendant's counsel, Douglas Kress, has stated that he consents to this short extension.**

WHEREFORE, Plaintiff Larry Klayman respectfully requests ten (10) Days, or until January 24, 2014 to respond to Defendant Judicial Watch's discovery requests.

Dated: January 13, 2014

Respectfully submitted,

/s/ Larry Klayman

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Plaintiff Pro Se

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 13, 2014, 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

**SERVICE LIST**

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VIA CM/ECF