

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

LARRY E. KLAYMAN,

Plaintiff,

v.

JUDICIAL WATCH, INC.,

Defendant.

DEFENDANT'S NOTICE OF OBJECTION TO ALLEGED CONSENT MOTION

Defendant JUDICIAL WATCH, INC., through undersigned counsel, files this Notice of Objection to Plaintiff's alleged "Consent" Motion in Limine filed as docket entry 70. Counsel conferred regarding this issue and there was clearly a misunderstanding. Judicial Watch does not agree to all of the terms of the alleged Consent Motion in Limine. Defendant agrees to the sealing of the portion of the deposition at issue, but not to the terms of the motion. Judicial Watch disagrees with many of the assertions in the alleged consent motion. Judicial Watch respectfully requests that the Court strike the alleged Consent Motion or hold the motion in abeyance pending counsel's efforts to present a mutually acceptable agreed motion. Defendant also requests that it be given the opportunity to file a substantive response to the Motion in Limine if this issue is not resolved between counsel.

Dated: **February 20, 2014**

Respectfully submitted,

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/s/ Douglas J. Kress
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CERTIFICATE OF SERVICE

I hereby certify that on **February 20, 2014**, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Douglas J. Kress
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VIA CM/ECF