

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

CASE NO.: 1:15-cv-22452-Moore-McAliley

DENNIS MONTGOMERY,

Plaintiff,

v.

AMERICAN CIVIL LIBERTIES  
FOUNDATION, ET AL.

Defendants.

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**PLAINTIFF'S CONSENT MOTION FOR EXTENSION OF TIME**

Plaintiff Dennis Montgomery hereby moves this court for an extension of fourteen (14) days, or until and including September 22, 2015 to file an opposition to Defendant's Motion to Dismiss and as grounds therefor would show:

- 1) On August 21, 2015, Defendants filed their Motion to Dismiss (ECF. No. 18).
- 2) The response in opposition to this motion is currently due on September 8, 2015.
- 3) Plaintiff's counsel was unexpectedly forced to travel out of state on business during the week prior to the deadline for filing a response. In addition, Plaintiff's counsel is preparing for upcoming depositions in unrelated matters which will consume a vast amount of Plaintiff's counsel's time in the coming weeks.
- 4) An extension of fourteen (14) days will allow Plaintiff the additional time needed to review Defendants' Motion to Dismiss and file a response in opposition.
- 5) Plaintiff sought consent from Defendants' counsel for the filing of this motion.

**Defendants consent to this motion.**

- 6) Neither party will be prejudiced as a result of this extension.

WHEREFORE, Plaintiff respectfully requests an extension of fourteen (14) days, or until and including September 22, 2015 to file an opposition to Defendant's Motion to Dismiss.

Dated: September 4, 2015

Respectfully Submitted,

/s/ Larry Klayman  
Larry Klayman, Esq.  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 4th day of September 2015, a true and correct copy of the foregoing was filed and served via CM/ECF upon the following:

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*Attorneys for Defendants*

/s/ Larry Klayman  
Larry Klayman, Esq.