IN UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

LARRY KLAYMAN, et. al.,

Plaintiffs,

V.

BARACK HUSSEIN OBAMA II, et. al.

Defendants.

Civil Action No.: 13-cv-851

13-cv-881

Judge Richard J. Leon

MOTION FOR TELEPHONIC STATUS CONFERENCE

Plaintiffs, Larry Klayman, Charles Strange, Mary Ann Strange, Matt Garrison, and Michael Ferrari, respectfully request, at the Court's convenience, a telephonic status conference.

It is apparent that the Government and Individual Government Defendants are having an increasingly chilling effect on the communications of American citizens who have no connection to terrorism, including former presidents who no longer use the phone or internet because they too are in fear of their current government. (See Exhibit 1 -- Associated Press article about President Carter refusing to Communicate by phone or internet). In the face of this, Defendant Obama, just yesterday, at a press conference in the Netherlands, disingenuously told American citizens and the world that "I'm confident that everybody in our intelligence agencies operates in the best of intentions and is not snooping into the privacy of ordinary Dutch, German, French or American citizens." See Exhibit 2 -- Transcript of President Obama's Remarks from March 25, 2014. Obviously, this has proven false, as the Court ruled on December 16, 2013. See Mem.

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Opinion of December 16, 2013. Thus, the illegal and unconstitutional conduct is not only ongoing, but the Government continues to lie about its actions.

Plaintiffs thank the Court for its consideration.

Plaintiffs contacted Defendant's counsel to seek consent for this motion. Predictably, Counsel for Defendants stated that they do not see the need for a status conference at this time.

Dated: March 26, 2014

Respectfully submitted,

/s/ Larry Klayman

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Attorney for Plaintiffs and the Class

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of March, 2014, a true and correct copy of the foregoing Motion For Telephonic Status Conference (Civil Action No. 13-cv-851 and 13-cv-881) 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,

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