

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

DENNIS MONTGOMERY, et al

Plaintiffs,

v.

JAMES COMEY, et al

Defendants.

Case No: 17-cv-1074

**PLAINTIFFS' MOTION TO SHORTEN TIME TO RESPOND TO PLAINTIFFS'
MOTION TO EXPEDITE DISCOVERY**

Plaintiffs Dennis Montgomery and Larry Klayman (“Plaintiffs” unless individually named) hereby move this Court for an order shortening the time for Defendants to respond to Plaintiffs’ Motion for Expedited Discovery - filed July 6, 2017 – until and including Wednesday, July 12, 2017. Counsel for Plaintiffs sought consent for this motion via email on July 7, 2017 at approximately 1:30 P.M. EDT from counsel for Defendants Federal Bureau of Investigation (“FBI”), Michael S. Rogers (“Rogers”), National Security Agency (“NSA”), Mike Pompeo (“Pompeo”), Central Intelligence Agency (“CIA”), James Clapper (“Clapper”), and Dan Coats (“Coats”). Counsel for Defendants FBI, NSA, CIA, Pompeo, Coats, and Rogers (in their official capacities), Mr. Gilligan, opposes this Motion. Counsel for Defendants Coats, Clapper, and Rogers (in their individual capacities), Mr. Whitman, has also opposed.¹

¹ Defendants James Comey (“Comey”) and John Brennan (“Brennan”) have been served both in their individual and official capacity, but have not appeared in this case. Defendant Obama has

Plaintiffs' Motion to Shorten Time is necessary in order for this Court to render a ruling on Plaintiffs' Motion to Expedite Discovery in a timely fashion that would allow all parties to adhere to the briefing schedule set forth in this Court's June 27th minute order and to prepare for the upcoming hearing on Plaintiffs' Motion for Preliminary Injunction. Indeed, Defendants are to submit any opposition to Plaintiffs' Motion for Preliminary Injunction and any Motions to Dismiss by August 1, 2017, and Plaintiffs are to submit any responses by August 15, 2017. An expedited ruling on Plaintiffs' Motion for Expedited Discovery – which is only possible if the response deadlines are truncated – would potentially allow all parties the benefit of discovery prior to completing substantive briefing. Thus, Plaintiffs respectfully request that this Court grant Plaintiff's Motion to Shorten Time and issue an order requiring Defendants to submit any opposition to Plaintiffs Motion for Expedited Discovery to July 12, 2017.

Dated: July 7, 2017

Respectfully submitted,

/s/ Larry Klayman
Larry Klayman, Esq.
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thus far evaded service. However, the underlying Complaint and the Motion for Preliminary Injunction were timely sent to his mansion and residence at 2446 Belmont Road, Washington, D.C., 20008 by Federal Express. Mr. Whitman has also accepted service of the Complaint on behalf of Mr. Pompeo, individually, but has not yet appeared on his behalf.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically and served through the court's ECF system to all counsel of record or parties on July 7, 2017.

/s/ Larry Klayman
Larry Klayman, Esq.