



Oliver Peer <oliver.peerfw@gmail.com>

Re: Montgomery v. Comey, No. 17-1074 (DDC) -- request for extension of time

Larry Klayman <leklayman@gmail.com>

Tue, Aug 8, 2017 at 11:56 AM

To: "Whitman, James (CIV)" <James.Whitman@usdoj.gov>

Cc: Sam Sun <sam.hs.fw@gmail.com>, Dina James <daj142182@gmail.com>, Oliver Peer <oliver.peerfw@gmail.com>, "Gilligan, Jim (CIV)" <James.Gilligan@usdoj.gov>

We will consent to a single response but cannot to any extension to time as we are bound to move forward expeditiously for the preliminary injunction hearing and ruling. We agreed by consent to forego our TR0 motion based on moving the PI along.

Larry Klayman
For the Plaintiffs

On Aug 8, 2017 11:53 AM, "Whitman, James (CIV)" <James.Whitman@usdoj.gov> wrote:

Mr. Klayman,

As you know, I represent the defendants in their personal capacity in the above case. By my calculations, based on the dates that they or their agents were personally served, the following are the various due dates for the defendants to file a motion to dismiss the individual-capacity claims in this case: August 18 for Coats; August 21 for Rogers; and September 5 for Pompeo, Comey, and Clapper. To streamline things, I would like to know if you would consent to (1) the individual defendants filing a single, consolidated motion to dismiss, and (2) an extension of time until September 13 to file such a motion. Please let me know if you consent.

Thank you,

Jim Whitman

Senior Trial Attorney

U.S. Department of Justice

Civil Division, Torts Branch

Constitutional Torts Section

P.O. Box 7146

Ben Franklin Station

Washington, DC 20044

for overnight deliveries:

1425 New York Ave., N.W.

Washington, DC 20005

Tel. (202) 616-4169

Fax (202) 616-4314