

**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-881

MOTION FOR LEAVE TO FILE SUPPLEMENTAL AFFIDAVIT

Plaintiffs hereby move this Court for leave to file the supplemental affidavit of David Siler (Attached as Exhibit 1) and as grounds therefor would show

1. On October 28, 2013 the Plaintiffs filed a Motion for Preliminary Injunction in the above styled lawsuit.
2. This Court has set a hearing on the Motion for Preliminary Injunction on November 18, 2013.
3. New information has come to light within the past few hours from a computer expert, David Siler, that corroborates the previous affidavit of Charles Strange, which was filed in conjunction with the Motion for Preliminary Injunction, that the NSA and the government are spying on the Plaintiff and violating the Patriot Act, the Foreign Intelligence Surveillance Act, and the U.S. Constitution.
4. Mr. Siler has created an affidavit and the Plaintiffs have attached the Affidavit of Mr. Siler as Exhibit 1.

5. Mr. Siler's affidavit will aid the Court and provide further evidence to the Court that a preliminary injunction is warranted in this lawsuit.
6. Neither party will be prejudiced as a result of the filing of this affidavit.
7. The Plaintiffs contacted Defendants' counsel to seek consent for this motion. The Defendants' counsel have not indicated whether they consent to this motion as of the time of this filing, which is being made in anticipation of the hearing on November 18, 2013.

WHEREFORE, the Plaintiffs respectfully request that this Court grant leave to the Plaintiffs to file the supplemental affidavit of David Siler, which is attached as Exhibit 1.

Dated: November 18, 2013

Respectfully submitted,

/s/ Larry Klayman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of November 17, 2013 a true and correct copy of the foregoing Motion For Leave To File Supplemental Affidavit (Civil Action No. 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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