

**THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

LARRY KLAYMAN,

Plaintiff-Appellant,

v.

JUDICIAL WATCH, INC., et al

Defendants-Appellees

Appeal No.: 19-7105

MOTION FOR LEAVE TO EXCEED PAGE LIMITATIONS

Appellant Larry Klayman (“Mr. Klayman”) hereby respectfully requests leave to exceed the length limitations for his forthcoming Petition for Rehearing En Banc set forth in Local Rule 35(b)(2) by ten (10) pages, for a total allotted twenty-five (25) pages.

Extraordinarily compelling circumstances exist, as this is an extremely high-stakes case with a \$2.8 million dollar jury verdict at stake, and with an incredibly voluminous record that spans sixteen (16) years. This was a very complex case, with numerous legal and factual questions at issue. Mr. Klayman must address these legal and factual questions in pending Petition for Rehearing En Banc, and as such, the currently allotted fifteen (15) pages will not be sufficient.

This reasonable request will not prejudice this Honorable Court or Appellees, as an additional ten (10) pages will not render Mr. Klayman’s pending

Petition for Rehearing En Banc unreasonably long. These additional pages are crucially important to provide the en banc panel with a full picture of the record and the extraordinarily compelling circumstances and concomitant legal and factual matters at issue, including the precedent the Three Judge Panel's Opinion of July 30, 2021 would create in this Circuit and around the circuits.

WHEREFORE Appellant, who will be proceeding pro se, respectfully requests leave to exceed the page and word limit as set forth above. Plaintiff is proceeding pro se, without any negative inferences being cast on co-counsel, because he wishes to address the members of this Honorable Court in the first person, given the stakes involved for him and his family.

Dated: August 18, 2021

Respectfully submitted,

/s/ Larry Klayman

Larry Klayman

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Appellant Pro Se

CERTIFICATE OF COMPLIANCE

I HEREBY CERTIFY that pursuant to Fed. R. App. P. 32(g)(1):

1. The Motion complies with length limit set by Fed. R. App. P. 27(d)(2) because the document contains only 255 words on 2 pages.

2. The Motion complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because the document was prepared in a proportionally spaced typeface using Microsoft Word 2019 in 14 point times new roman type style

/s/ Larry Klayman

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of August, 2021, a true copy of the foregoing was electronically transmitted by the Court's ECF system to all counsel and parties of record.

/s/ Larry Klayman