

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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ROGER HALL, <u>et al.</u> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 04-00814 (HHK)
)	
CENTRAL INTELLIGENCE AGENCY,)	
)	
Defendant.)	
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**JOINT MOTION FOR EXTENSION OF TIME TO SUBMIT JOINT PROPOSED CASE
MANAGEMENT PLAN & BRIEFING SCHEDULE TO GOVERN FURTHER
PROCEEDINGS**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), plaintiffs Roger Hall, Studies Solutions Results, Inc., and Accuracy in Media, Inc. (“AIM”), and defendant the Central Intelligence Agency (“CIA”) (collectively, the “parties”) by and through undersigned counsel, respectfully request that this Court extend the date by which they must submit a joint proposed case management plan and briefing schedule to govern further proceedings in this case by fourteen (14) days, i.e., to and including December 18, 2009. Pursuant to Local Civil Rule 7(m), Assistant United States Attorney David Rybicki (“the Undersigned AUSA”) contacted Plaintiffs’ counsels, who consent to the relief requested herein.

Good cause supports this motion. The Undersigned AUSA has been in contact with representatives of the CIA, who are aware of the Court’s various orders announced in Hall v. Central Intelligence Agency, 2009 WL 3768002 (Nov. 12, 2009), and are currently in the process of determining the time necessary for the CIA to respond as ordered. The parties believe that the extension of time requested here is crucial to formulating a realistic case management plan and briefing schedule to govern the further proceedings of this action.

This request for extension of time is submitted in good faith and not for purposes of delay. A proposed order consistent with the relief requested herein is attached.

Respectfully submitted,

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