

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

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	)	
<b>ROGER HALL, <u>et al.</u>,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 1:04-cv-00814-HHK</b>
	)	
<b>CENTRAL INTELLIGENCE AGENCY,</b>	)	
	)	
<b>Defendant.</b>	)	
_____	)	

**MOTION FOR EXTENSION OF TIME TO FILE EXHIBIT C OF THE COLE  
DECLARATION<sup>1</sup>**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), the Central Intelligence Agency (“CIA” or “Defendant”), by and through undersigned counsel, respectfully requests that the Court extend the date by which Defendant must file Exhibit C of the Cole Declaration by one (1) day, i.e., until and including August 24, 2010. Pursuant to Local Civil Rule 7(m), on August 23, 2010, Assistant United States Attorney David Rybicki (“the Undersigned AUSA”) attempted to contact Plaintiffs’ counsel, James Lesar, Esq., but was unable to do so due to the lateness of the hour.

Good cause supports this motion. Defendant has electronically filed all documents required by the Court’s November 12, 2009, Order. Due to late-developing technical difficulties in filing Exhibit C of the Cole Declaration, however, Defendant is unable to file that Exhibit today. The Exhibit is a several-hundred-page-long Vaughn index which the U.S. Attorney’s Office is unable to scan, stamp, and upload currently. Defendant will file the Exhibit with the Court tomorrow, if need be, in hard copy.

<sup>1</sup> The Undersigned AUSA mistakenly filed another document with the Court on August 23, 2010, instead of this motion for extension of time. The Undersigned AUSA now respectfully files the proper document, and apologizes for the error.

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.

Dated: August 30, 2010

Respectfully submitted,

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for the District of Columbia

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