

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al.,	:	
	:	
Plaintiffs	:	
	:	
v.	:	C. A. No. 04-0814 (RCL)
	:	
CENTRAL INTELLIGENCE	:	
AGENCY,	:	
	:	
Defendant	:	
	:	

**PLAINTIFFS' UNOPPOSED MOTION FOR FURTHER
EXTENSION OF TIME WITHIN WHICH TO REPLY TO
DEFENDANT'S OPPOSITION TO MOTION FOR
INTERIM AWARD OF ATTORNEY'S FEES AND COSTS**

Plaintiffs Roger Hall and Studies Solutions Results, Inc., (“Hall”), joined by Accuracy in Media (“AIM”), move for an extension of time, to and including March 23, 2015, within which to file their replies to the opposition of defendant Central Intelligence Agency (“CIA”) to plaintiffs’ motions for interim awards of attorneys’ fees and costs. As grounds for this motion, Hall represents to the Court as follows:

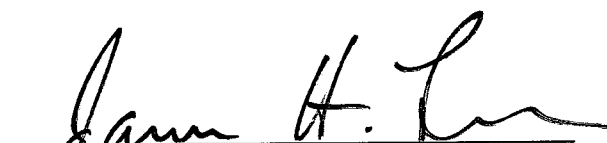
1. Plaintiffs previously moved for an extension to and including March 17, 2015 to file their replies to the CIA’s opposition. That motion has not yet acted upon by this Court.

2. Immediately after Plaintiff Hall's counsel, James H. Lesar, filed the previous motion for extension of time, he slipped on loose sheet of paper and fell backwards into the swivel chair in front of his desk. The chair then scooted full tilt into the desk, toppling the computer monitor and putting him out of commission until a Computer Geeks technician arrived a day and half later and determined that the monitor was cracked and needed to be replaced. In addition to having lost almost two full work days due to this incident, counsel lost another two days due to illness.

3. A fair amount of work was done by Hall's counsel despite these difficulties, but there is a voluminous record which must be consulted in order to prepare a proper response. This is requiring more time than anticipated.

4. Counsel for AIM has been unable to devote the time necessary to complete his reply brief due to other matters that require his immediate efforts. These include filing a lawsuit in D.C. Superior Court that must be filed this week on pain of suffering a meritorious statute of limitations defense, filing a time-sensitive motion for an extension of a Civil Protection Order, as well as a meeting with seven clients that he represents in a FOIA case pending in this Court, Case No. 14-1589 (EGS).

5. Defendant does not oppose this motion.



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Dated: March 17, 2015