

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

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ROGER HALL, ET AL.,		)	
		)	
Plaintiffs		)	
		)	
v.		)	Civil Action No.: 04-814 (RCL)
		)	
CENTRAL INTELLIGENCE AGENCY,		)	
		)	
Defendant		)	
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**DEFENDANT’S MOTION FOR 14-DAY EXTENSION OF TIME TO  
FILE ITS MOTION FOR SUMMARY JUDGMENT**

Defendant, the Central Intelligence Agency (CIA), respectfully moves the Court to extend defendant’s time to file its motion for summary judgment until November 29, 2017. In support of its consent request, defendant states as follows.

1. By order dated September 27, 2017, the Court instructed that the CIA shall file its motion for summary judgment by November 15, 2017; that plaintiffs shall file their opposition by January 1, 2018; and that the CIA shall file its reply by February 15, 2018.
2. Due to the press of competing business and the CIA’s desire to ensure that its declaration is sufficiently thorough to correct the deficiencies the Court identified in its previous motion, the CIA would benefit from additional 14 days in which to file its motion. The CIA’s declarant has multiple motions due in a small window of time, and undersigned counsel has faced, *inter alia*, a 4-day Title VII trial and a D.C. Circuit appeal in the first two weeks of November.

3. On November 7, the CIA sought plaintiffs' consent to the relief sought. Mr. Clarke, counsel for plaintiff Accuracy in Media, has consented. Mr. Lesar, counsel for plaintiff Hall, has not responded to the November 7 email or a follow-up email sent on November 8.

For these reasons, defendant CIA respectfully requests that its time to file its motion be extended until November 29, 2017. A proposed order is filed herewith.

Respectfully submitted,

JESSIE K. LIU, D.C. Bar No. 472845  
United States Attorney

DANIEL F. VAN HORN, D.C. Bar No. 924092  
Chief, Civil Division

By: /s/ Damon Taaffe  
DAMON TAAFFE  
Assistant United States Attorney, Civil Division  
D.C. Bar No. 483874  
555 Fourth Street, N.W.  
Washington, D.C. 20530  
(202) 252-2544  
damon.taaffe@usdoj.gov

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Defendant	)	
_____	)	

**[PROPOSED] Order**

Upon consideration of defendant’s consent motion for an extension of time to file its reply in support of its motion for summary judgment, and also to oppose plaintiffs’ cross-motions for summary judgment, it is hereby ORDERED that the motion is GRANTED. Defendant shall file its motion for summary judgment by November 29, 2017.

\_\_\_\_\_  
Date

\_\_\_\_\_  
United States District Judge