

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 04-814 (RCL)
)	
CENTRAL INTELLIGENCE AGENCY,)	
)	
Defendant.)	
_____)	

PLAINTIFFS' UNOPPOSED MOTION FOR ENLARGEMENT
OF TIME TO FILE CROSS-MOTIONS FOR SUMMARY JUDGMENT

COME NOW plaintiffs Roger Hall, Studies Solutions Results, Inc., and Accuracy in Media, Inc., by counsel, under Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, and respectfully move this Court for 14-day enlargement of time to file their opposition to defendant's renewed motions for summary judgment. Defendant CIA consents to this relief.

Memorandum of Points and Authorities

1. By minute order entered on September 27, 2017, the Court instructed defendant to file its motion for summary judgment by November 15, 2017, the plaintiffs to file their opposition by January 15, 2018, and the defendant to file its reply by February 15, 2018.
2. On November 9, 2017, defendant filed an unopposed motion for a 14-day enlargement of time to file its motion for summary judgment, and, thereafter, submitted that dispositive motion on November 28, 2017.

3. The week of January 1, 2018, the Internet connection of plaintiff Hall's counsel, James H. Lesar, failed for a period of four days due to a power outage that affected some units in the Silver Spring condominium where he has his office. The following week, his Internet connection was once again disrupted. At that time, a Computer Geeks technician advised him that his Windows 7 is "completely corrupt" and a "complete mess." So, Computer Geeks took the computer to its office, where they were to retrieve, copy, and save his data, after which the technicians were to scrub his hard drive clean and restore the data. On January 14, a technician came to Mr. Lesar's office to restore the data. However, the technician was unable to restore the data, and had to again take the computer back to Computer Geeks office to determine how to remedy this new problem. At the present time, Mr. Lesar does not know when the process will be completed.

4. Mr. Lesar has an extremely crowded schedule, which has become more so in part due to the need to move for extensions in several other cases. Mr. Lesar needs extensions of time in these other cases in part due to the fact that his client Angela Clemente has received threats to her property and life because of her activities in uncovering corrupt activities on the part of local, state, and federal officials in drug trafficking, requiring counsel to expend many hours trying to protect her against these threats. See attached Exhibit A, Appellant's Consent Motion to Further Revise Briefing Schedule, filed on January 5, 2018, in *DiBacco et al. v. Dept. of Army, et al.*, USCA DC Case No. 17-5067. Mr. Lesar's schedule is further complicated by the fact that in *Clemente v FBI*, USCA DC Case 16-5067, the clerk of the DC Court of Appeals has issued an order instructing the government respond to her Petition for Rehearing *En Banc* by January 29, 2018.

5. In light of the above, plaintiffs seek an extension to January 31, 2018 to file their opposition to defendant's dispositive motion. For good cause shown, the Court should grant the requested extension of time.

WHEREFORE, plaintiffs respectfully seek an extension of time to and including January 31, 2018, to submit their opposition to defendant's renewed motion for summary judgment.

DATE: January 16, 2018.

Respectfully submitted,

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