

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

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

**FINAL MOTION OF PLAINTIFFS ROGER HALL
AND STUDIES SOLUTIONS RESULTS,
INC. TO FURTHER REVISE BRIEFING SCHEDULE**

Plaintiffs Roger Hall (Hall) and Studies Solutions, Inc.

**(SSRI, Inc.)(collectively “Hall”), move the Court for an
extension of time to, and including Jan. 7, 2019, to file their
renewed cross-motion for summary judgment and other**

relief. As grounds for this motion, Hall states to the Court as follows:

On December 26, 2018, Hall moved this Court for an extension of time to and including Jan. 3, 2019 within which to file his response to the CIA cross-motion for summary judgment.

This Court has not yet acted on the motion Hall filed on December 26, 2018.

AUSA Damon Taaffe is out of the office until Jan. 3, 2019. On December 20th, he advised Hall's counsel that "we will take no position on any future extension requests but ask that you set the reply deadline for oppositions to both plaintiffs' filings for 30 days after you file. With the lapse in federal funding, I'm furloughed and may be unable to communicate further on this."

On the days immediately after the undersigned counsel submitted Hall's motion, he had to spend most of his time moving for extensions of time in other cases he is handling or negotiating for extensions on behalf of clients he represents or on behalf of government agencies represented by opposing counsel or both. He was also plagued by continuing debilitating pain and fatigue.

Counsel's problem in getting back to work on his brief in this case was compounded on December 27th and December 28th by the fact that he and assistants had to spend many hours trying to deal with formatting issues which made it difficult for counsel to do any productive work. Eventually these problems were in large part resolved, though problems still remain, particularly in the area of counsel's inability to cut and paste from many relevant motions and filings. As a result, he has had to

spend a great deal of time re-typing materials contained in other documents.

On Monday, December 31, 2018, counsel cancelled an appointment with his internist in hopes of being able to work on this case. That vanished when he had to spend time at banks making sure that donations to the non-profit organization he runs and to his attorney law firm were timely and properly made.

On January 1, 2019, counsel had a very productive day, and it is possible that he only needs to extend his time by one day, to January 4, 2019. However, he has an appointment with his physical therapist on January 2d. Having cancelled last week's physical therapy appointment, he feels he would be ill-advised to miss a second week in a row. He also needs to spend some time on January 3d moving for or negotiating extensions of time in other

pending cases. Accordingly, to make sure this is the final request for an extension, he moves to extend Hall's time to and including January 7, 2019. Counsel believes this additional time will benefit all sides and the Court.

Respectfully submitted

/s/

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**Counsel for Roger Hall and
Studies Solutions Results, Inc.**

Dated: Jan. 2, 2019