

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

PLAINTIFFS' MOTION FOR LEAVE TO FILE OPPOSITION
DEFENDANT'S MOTION FOR A PROTECTIVE ORDER OUT-OF-TIME

Plaintiffs Roger Hall and Studies Solutions Results, Inc. hereby move the Court to file their opposition to defendant's motion for a protective order out-of-time. As grounds, therefore, they represent to the Court as follows.

1. Plaintiffs' opposition was due on November 13, 2006. It actually got filed a few minutes late.

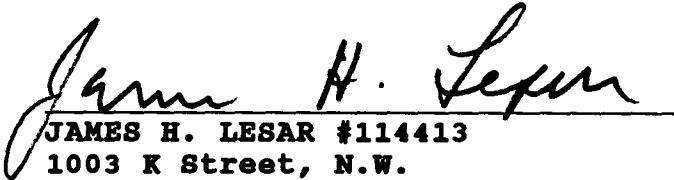
2. Around 11:20 P.M. plaintiffs' counsel scanned the opposition into his computer and by shortly after 11:30 PM he had converted it to a pdf document. After filing a motion to extend time to respond to defendant's motion for partial summary judgement he began to file his opposition. Initially, matters proceeded promptly and it looked like he would complete the filing several minutes before the midnight deadline. Unfortunately, when trying to add Exhibit 4 to the list of exhibits, his computer balked. Repeated clicks on the button he thought he had clicked on to add the first three exhibits did not produce the desired result. In desperation as his time ran out, he clicked on the "next"

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button, which produced a message telling him to add the exhibit to the list. Repeated clicks on what he thought was the "add to" button and the "next" button continued to be fruitless.

3. After some 15 minutes of sheer frustration, counsel finally clicked directly on the bar that says "add to" rather than on the block to the left of it. This solved his problem, but once again authenticated his daughter's description of him as a "low tech person."

Respectfully submitted,



JAMES H. LESAR #114413
1003 K Street, N.W.
Suite 640
Washington, D.C. 20001
Phone: (202) 393-1921

Counsel for Plaintiffs
Roger Hall and SSRI

Dated: November 14, 2006

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Upon consideration of plaintiffs motion for leave to file their opposition to defendant's motion for a protective order out-of-time, and the entire record herein, it is by this Court this _
_ day of November, 2006

ORDERED, that plaintiffs' motion for leave to file their opposition to defendant's motion for a protective order be, and hereby is, GRANTED.

UNITED STATES DISTRICT JUDGE