

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, Et al.,

Plaintiffs,

v.

CENTRAL INTELLIGENCE AGENCY,

Defendant

C. A. No. 04-0814 HHK/JMF

PLAINTIFFS' MOTION TO SET TIME  
FOR FILING OF SUPPLEMENTAL MEMORADUM

Come now plaintiffs Roger Hall and Studies Solutions Results, Inc. and move this Court for an order allowing them until January 17, 2007 to file a supplemental memorandum regarding defendant's motion for a protective order. As grounds for This motion, plaintiffs state to the Court as follows.

1. On December 28, 2006, defendant filed its reply to plaintiffs' opposition to its Motion for a Protective Order. On or about December 23, 2006, plaintiff's counsel began to suffer a series of breakdowns in computers, a printer, and a scanner. As a result, when he left December 29, 2006 on a New Year's trip, he was unaware that defendant had filed its reply on December 28<sup>th</sup> as scheduled.

2. Counsel returned to work from his New Year's trip on January 3, 2007, Facing a situation in which his old reliable 1989 NEC Computer with its WordPerfect 5.1 program would be available to him shortly. This did not happen. He also hoped that the Fujitsu 15C scanner connected to his Dell Windows 96 computer would become

operational again. He thought this would happen after Computer Geeks came to his office, but after multiple visits he ended up having to switch to a newer computer and newer scanner, to transfer 32 gigabytes of material from his old Windows 98 computer to newer computer, and to begin to learn to use Microsoft Word, which he found frustrating.

3. In short, most of counsel's time since he returned from vacation has been spent trying to get computer problems fixed or learning a new word processing system.

4. Defendant's reply raises new claims which should be addressed by plaintiffs. Accordingly, they seek until February 15, 2006, to file a supplemental memorandum.

5. Because of the hour at which this is being filed, plaintiff's counsel has not sought to contact counsel for defendant.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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Counsel for Plaintiffs

Dated: January 11, 2007