

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al.,

Plaintiffs,

v.

CENTRAL INTELLIGENCE AGENCY,

Defendant

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Civil Action No. 04-0814 (HHK)

UNOPPOSED MOTION FOR TWO-DAY TENSION OF
TIME TO RESPOND TO DEFENDANT'S MOTION TO
DISMISS AND FOR PARTIAL SUMMARY JUDGMENT

Come now the plaintiffs and moves this Court for an extension of time, to and including May 10, 2007, within which to file their responses to defendant Central Intelligence Agency's motion to dismiss or for partial summary judgment. As grounds for this motion, plaintiffs represent to the Court as follows:

1. Plaintiffs' responses are currently due on May 8, 2007.
2. On Sunday, May 6th, Mr. James H. Lesar, counsel for plaintiffs Roger Hall and Studies Solutions Results, Inc. ("SSRI"), worked from 8:00 p.m. to 2:30 a.m. on Monday, May 7th, on a section of plaintiffs' Hall SSRI's brief which deal with the CIA's exemption claims. Of the four exemptions challenged, he completed a draft of three of them, then took a break at 2:30 a.m. to have a snack and review some notes. Before leaving the 1989 NEC computer in his basement in which he types his briefs using Word Perfect 5.1, he thought he had saved the brief he had completed to that point. When he returned he was horrified to find that he had saved another document on his two-screen computer, a brief in another

case from which he had been lifting material for his brief in this case, but had exited his brief in this case without saving it. As a result, he lost about ten pages which were the result of his day's work and has had to re-do it all from scratch.

3. Defendant does not oppose this motion but does ask that its opposition/reply to plaintiffs' response be extended to May 31, 2007. Plaintiffs do not oppose this and have provided for this in the proposed order.

Respectfully submitted,

/s/

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/s/

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DATED: May 7, 2007

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ROGER HALL

Plaintiff,

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O R D E R

Upon consideration of plaintiffs' unopposed motion to extend their time to respond to defendant's motion to dismiss or for partial summary judgment, and the entire record herein, it is by this Court this _____ day of May, 2007, hereby

ORDERED, that plaintiffs shall have until May 10, 2007, to file their response to defendant's motion to dismiss or for partial summary judgment; and it is further

ORDERED, that defendant shall have until May 31, 2007, to file any opposition/reply to plaintiffs' response.

UNITED STATES DISTRICT COURT