

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ROBERT MOORE, <i>et al.</i>	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	Civil Action No. 20-1027 (RCL)
CENTRAL INTELLIGENCE AGENCY,	)	
	)	
Defendant.	)	
_____	)	

JOINT MOTION FOR ENLARGEMENT OF TIME TO  
SUBMIT A SUMMARY JUDGMENT BRIEFING SCHEDULE

COME NOW Plaintiffs and Defendants, by counsel, under Rule 6(b) of the Federal Rules of Civil Procedure, and respectfully move the Court for an enlargement of time to submit their proposed briefing schedule for dispositive motions, until ten days after the Court rules on Plaintiffs' Motion for Leave to Amend their Complaint.

Memorandum of Points and Authorities

1. Pursuant to this Court's Order dated July 28, 2022 (ECF No. 41), the parties, by counsel, have met and conferred on a proposed joint briefing schedule. Under the Court's Order, the proposed joint briefing schedule is due today.

2. Yesterday, on August 25, 2022, Plaintiff filed a Motion for Leave to File an Amended Complaint. ECF No. 42. Plaintiff seeks to add an additional counts alleging that the CIA improperly classified and withheld records under 50 U.S.C. § 3141. *Id.* Plaintiff also seeks to narrow the FOIA request for information on Harry Moore and to add Michael Diggs as an additional plaintiff. *Id.*

3. Defendant opposes the motion.

4. The parties agree that submission of a briefing schedule is not possible until after the Court rules on Plaintiffs' Motion for Leave to Amend.

5. The parties suggest that the proper course of action is to submit to the Court a proposed briefing schedule ten days after the Court rules on Plaintiffs' Motion to Amend their Complaint.

6. Because Defendant is unable to file a dispositive motion until the Court has ruled on Plaintiffs' pending motion, the parties request the following dates for the briefing on the Motion for Leave to File an Amended Complaint:

- |   |  |
|---|--|
| (a) Defendant CIA's Opposition to Plaintiffs' Motion to File Amended Complaint: | September 15, 2022.  |
| (b) Plaintiff's Reply:  | September 22, 2022   |
| (c) Parties' proposed schedule for further Proceedings:                         | 10 days after the Court rules on Plaintiffs' Motion to Amend Complaint |

WHEREFORE, the parties respectfully move for enlargement of time to submit a proposed briefing schedule, until ten days after the Court rules on Plaintiffs' Motion for Leave to Amend their Complaint.

DATE: August 25, 2022.

Respectfully submitted,

        /s/ John H Clarke          
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