

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' UNOPPOSED MOTION FOR FURTHER
EXTENSION OF TIME WITHIN WHICH TO REPLY TO
DEFENDANT'S OPPOSITION TO MOTION FOR RECONSIDERATION

Come now the plaintiffs, Roger Hall (“Hall”) and Studies Solutions Results, Inc., (“SSRI”), joined by plaintiff Accuracy in Media, Inc., (“AIM”) and move this Court for an extension of time, to and including December 9, 2008, within which to file their cross-motions for summary judgment and oppositions to defendant’s motion for summary judgment. As grounds for this motion, plaintiffs Hall and SSRI state the Court as follows.

1. Plaintiffs’ summary judgment motions are currently due December 5, 2008.

2. The undersigned counsel completed a brief due in Lardner v. FBI, et al., Civil Action No. 03-0874 (HHK) on November 26, 2008, although he was sick much of that day. He began working on the renewed motion for summary judgment on Saturday, November 29th. However, plans to complete and file the motion by December 5th have been interrupted to various unanticipated degrees by (1) the arrival of three of his wife's brothers, a sister-in-law, and a nephew from Singapore on virtually no notice; (2) the loss of a crown while dining, thus occasioning a dental appointment on December 3d, which, together with an appointment to see a physical therapist that day will effectively consume half a day; and (3) an appointment on December 5th for an annual examination by his cardiologist which counsel did not have on his radar screen when he agreed to the current December 5th deadline. It is important to keep the cardiac appointment because his doctor became concerned last year that his "athletic" heartbeat, which normally ranges in the high 40s and low 50s during the day and mid to low 40s at night, might be dipping down into the 20s while he was asleep. A 24-hour heart monitor then discovered a minor arhythmia and consideration was given to implanting a pacemaker. In recent weeks, when counsel has taken his blood pressure upon arising from sleep, the

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ORDER

Upon consideration of plaintiffs' unopposed motion for an extension of time, and the entire record herein, it is by this Court this _____ day of _____, 2008, hereby

ORDERED, that plaintiff shall have December 9, 2008, to file their motions for summary judgment and oppositions to defendant's motion for summary judgment.

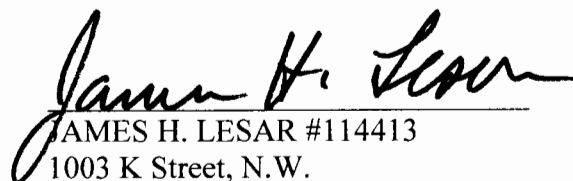
UNITED STATES DISTRICT COURT

heartbeat has sometimes been in the 30-34 range, so he is somewhat concerned that notwithstanding the fact that he still plays full court basketball at age 68, there may be a heart problem that needs to be addressed sooner rather than later.

3. Counsel for Plaintiff Accuracy in Media has asked plaintiffs Hall and SSRI to advise the Court that they also seek an extension.

4. Defendant does not oppose this motion.

Respectfully submitted,



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Dated: December 3, 2008