

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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

CONSENT MOTION FOR EXTENSION OF TIME

Defendant, through and by undersigned counsel, hereby submits this Motion for Extension of Time to respond to Plaintiffs' cross motions for summary judgment and oppositions to Defendant's dispositive motions (collectively "Plaintiffs' filings"), including and until February 24, 2009.

1. Defendant's responses to Plaintiffs' filings are due on February 9, 2009.
2. Although the Agency's opposition brief to Plaintiffs' filings is, in substantial part, complete, and undersigned counsel believed that the remaining work could have been completed today, it became apparent this weekend that additional time to confer with the Agency will be necessary in order to complete the response to Plaintiffs' lengthy statements of material facts. Another reason for this request is undersigned counsel's work schedule, which has recently included settlement negotiations in a Freedom of Information Act matter; discovery in an employment discrimination case and a subpoena matter; motions practice in a constitutional torts case; as well as settlement negotiations in a Federal Tort Claims Act matter.
3. Pursuant to Local Rule 7(m), the parties have conferred and attorneys for all Plaintiffs graciously consent to the relief requested.

4. This is the second extension request made for this deadline.
5. Defendant therefore requests fifteen additional days to file its responses.

WHEREFORE, Defendant requests that this enlargement be granted, and that the date for the filing of its responses to Plaintiff's filings be extended to February 24, 2009. A minute order is requested.

Respectfully submitted,

/s/ Jeffrey A. Taylor

Dated: February 9, 2009.

JEFFREY A. TAYLOR, D.C. Bar No. 498610
United States Attorney

/s/ Rudolph Contreras

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/s/ Mercedeh Momeni

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of February 2009, I caused the foregoing *Motion for Extension of Time* to be served on parties of record, via the Courts ECF system.

/s/ Mercedeh Momeni
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