

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' JOINT MOTION FOR ENLARGEMENT  
OF TIME WITHIN WHICH TO FILE REPLY MEMORANDA

Come now the Roger Hall, Studies Solutions Results, Inc., and Accuracy in Media, Inc. (“plaintiffs”), and move this Court for an extension of time, to and including September 14, 2009, within which to file their Memoranda in Reply to defendant Central Intelligence Agency’s (“CIA”) opposition to dispositive motions. Plaintiffs’ counsel attempted to contact defense counsel, but was unsuccessful, and so cannot make a representation whether the CIA opposes this motion. In support hereof, plaintiffs respectfully state:

1. By Order entered on April 8, 2009 (Docket # 126), the Court granted plaintiffs’ Joint Motions for 90-day Stay of the proceedings, to facilitate defendant’s ability to assess its compliance with President Obama’s January 21, 2009 Freedom of Information Act (“FOIA”) Memorandum, designed to improve the federal government’s openness and transparency.

2. By Minute Order entered on August 23, 2009, the Court denied plaintiffs’ Motion for an Order Requiring Defendant to File a Status Report concerning its

compliance with the Attorney General's March 19, 2009 "Memorandum for Heads of Executive Departments and Agencies" regarding the government's new disclosure policy under the FOIA.

3. Prior to plaintiffs' having sought a Stay of Proceedings (Docket # 122), summary judgment briefing was underway. All parties had filed their dispositive motions and oppositions, and the CIA had filed its Reply Memorandum.

4. Now, inasmuch as the Court has ruled on the matters occasioning plaintiffs' postponement of the filing their Reply Memoranda, plaintiffs intend to submit these pleadings by September 14, 2009.

5. Given the procedural history of this action, the due date for plaintiffs' Reply Memoranda cannot be stated with certainty by a literal reading of the Local Rules, except to conclude that the subject filings are due today at the earliest. Under that interpretation, plaintiffs are seeking a twelve-day extension of time.

WHEREFORE, Plaintiffs Roger Hall, Studies Solutions Results, Inc., and Accuracy in Media, Inc., respectfully move this Court for an extension of time, to and including September 14, 2009, within which to file their Memoranda in Reply to Defendant Central Intelligence Agency's opposition to dispositive motions

Respectfully submitted,

/s/

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