

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

:

UNOPPOSED MOTION FOR FURTHER EXTENSION OF TIME TO
FILE RESPONSE TO CIA'S SUPPLEMENTAL MEMORANDUM

Come now the plaintiffs, Roger Hall and Studies Solutions Results, Inc., (hereafter collectively referred to as "Hall"), and Accuracy in Media, and move this Court for a further extension of time, to and including April 7, 2011, to respond to the CIA's Supplemental Memorandum in Response to Court's November 12, 2009 Order. As grounds for this motion, plaintiffs state to the Court as follows:

1. As a result of previous extensions of time, plaintiffs' response is currently due on April 1, 2011.

2 Plaintiff Roger Hall and his counsel met in counsel's Silver Spring office on Sunday, March 20th, and again on Sunday, March 27th to review

records selected as a result of his review and to prepare a declaration.

Unfortunately, much of the time spent on March 27th had to be devoted to fixing a problem preventing attorney James H. Lesar's access to his internet service. They met again on March 29th and March 30th, together with AIM's counsel, John Clarke. Substantial progress on preparation of a declaration by Hall has been made, but a substantial amount of work remains to be done. Another conference between Hall, Clarke and Lesar is scheduled for Thursday afternoon, March 31st.

3. Plaintiff Hall's counsel had anticipated spending several hours working on this case during the evening of March 30th, but this plan was interrupted by renewed mediator negotiations in his Morley case in the Court of Appeals, and by a limited amount of work that had to be done immediately in the case of Ralph Schoenman v. F.B.I., et al., Civil Action No. 03-2545. More work will have to be done in the Morley case over the next several days, although just when and how much is unclear at this point.

4. Defendant does not oppose this motion.

Respectfully submitted,

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_____/S/_____
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Counsel for Plaintiff AIM, Inc.

Dated: March 31, 2011

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FOR THE DISTRICT OF COLUMBIA

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Plaintiffs,	:	
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v.	:	Civil Action No. 04-0814 (HHK)
	:	
CENTRAL INTELLIGENCE	:	
AGENCY :	:	
	:	
Defendant	:	

ORDER

Upon consideration of plaintiffs' unopposed motion for a further extension of time to respond to the CIA's supplemental memorandum, and the entire record herein, it is by this Court this _____ day of _____, 2011, hereby

ORDERED, plaintiffs shall respond to the CIA's supplemental memorandum on or before April 7, 2011.

UNITED STATES DISTRICT COURT