

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

_____)	
ROGER HALL, <u>et al.</u>)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 1:04-cv-00814-HHK
)	
CENTRAL INTELLIGENCE AGENCY)	
)	
Defendant.)	
_____)	

**DEFENDANTS’ UNOPPOSED MOTION FOR EXTENSION OF TIME TO REPLY TO
PLAINTIFFS’ OPPOSITION TO DEFENDANT’S SUPPLEMENTAL MEMORANDUM**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), the Central Intelligence Agency (“Defendant”), respectfully moves the Court for sixty (60) days’ extension of time to reply to the opposition of Roger Hall, et al. (“Plaintiffs”) to Defendant’s Supplemental Memorandum. On May 12, 2011, the undersigned AUSA obtained consent for the relief sought herein from counsel for Plaintiffs, James Lesar, Esq.

Good cause supports this motion. On February 17, 2010, the Court issued a Case Management Plan and Briefing Schedule (“Briefing Schedule”) to govern proceedings in this action. Corrected Case Management Plan & Briefing Schedule, Dkt. No. 146 (Feb. 17, 2010). Pursuant to the Briefing Schedule, Defendant filed its Supplemental Memorandum and accompanying exhibits and declarations on August 23, 2010. Memorandum, Dkt. No. 148 (Aug. 23, 2010). Plaintiffs then opposed Defendant’s Supplemental Memorandum on April 18, 2011. Response to Order of the Court, Dkt. No. 163 (Apr. 18, 2011). Accordingly, Defendant’s reply is due May 18, 2011. See Corrected Case Management Plan & Briefing Schedule, Dkt. No. 146 (Feb. 17, 2010).

Since Plaintiffs have filed their Opposition, Defendant has worked diligently to formulate its reply, but requires additional time due to the sheer number of documents involved in this FOIA action. Moreover, Plaintiffs have recently submitted additional privacy waivers from the families of POW/MIAs. Defendant has agreed to conduct additional searches for documents in light of Plaintiffs' new submissions, but requires additional time to do so. Accordingly, Defendant respectfully requests a sixty (60) day extension of time to perform these tasks and reply to Plaintiffs' Opposition, i.e., to and including July 17, 2011.

This motion for extension of time is submitted in good faith and not for purposes of delay. A proposed order is submitted concurrently.

Date: May 13, 2011
Washington, D.C.

Respectfully submitted,

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