

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

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

**DEFENDANT’S UPDATED NOTICE OF ANTICIPATED
FILING OF SUPPLEMENTAL ITEM 4 AND ITEM 5 DOCUMENTS**

The Central Intelligence Agency (“Defendant” or “CIA”), through and by undersigned counsel, respectfully updates its notice of anticipated filing of supplemental Item 4 and Item 5 documents (“initial notice”) [No. 170].

Since the CIA filed its initial notice, it has been working diligently with other agencies to gather further information necessary to finalize its declaration and corresponding exhibits. As of this date, one government agency to whom documents were referred, has provided this Office with a declaration, which is ready to be filed with the Court.¹ Additionally, another federal agency has directly provided a response to the Freedom of Information Act request made by Plaintiffs by releasing documents on or about October 5, 2011.

However, additional time is necessary for two government agencies to provide further information to this Office and to the CIA. Due to the need for further coordination, and the upcoming holidays, it is anticipated that the information will be prepared and forwarded to this

¹ In order to provide the Court with a complete set of records simultaneously, that declaration will be filed when all relevant documents are ready for filing.

Office no later than mid-January, 2011. The CIA therefore respectfully notifies this Court that it anticipates providing all outstanding Item 4 and Item 5 coordination documents to Plaintiffs no later than January 17, 2011, at which time the CIA will file the supplemental Item 4 and Item 5 documents with the accompanying *Vaughn* indices and supporting declarations.

Respectfully submitted,

RONALD C. MACHEN JR.
United States Attorney

RUDOLPH CONTRERAS
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_____/s/_____
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Dated: November 29, 2011.