

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

CONSENT MOTION FOR EXTENSION OF TIME TO FILE
OPPOSITION TO CIA'S SUPPLEMENTAL ITEMS 4 AND 5
RESPONSE TO COURT'S NOVEMBER 12, 2009 ORDER

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 an extension of time, to and including June 20, 2012, to respond to the CIA's Supplemental Items 4 and 5 Response to the Court's November 12, 2009 Order. As grounds for this motion, plaintiffs state to the Court as follows:

1. Plaintiffs' response is due June 15, 2012. At a status conference on April 20, 2012, the Court directed defendant to file its supplemental motion for summary judgment by May 15, 2012, and gave plaintiffs until

June 15, 2012 to file their opposition. From the bench the Court indicated that no further extensions would be granted.

2. Extenuating circumstances impel plaintiff Hall to seek a three working-day extension, to June 20, 2012. Last June Hall suffered a stroke which left the left side of his body impaired. The use of his left arm and hand is severely limited. Using a cane, he is able to walk only a very short distance. Because of these handicaps, it is extremely difficult for him to manipulate papers, particularly large volumes of papers.

3. In early February 2012, the undersigned counsel received a large bundle of newly released documents from the National Security Agency (NSA). He immediately took the bundle to Mr. Hall's apartment and Mr. Hall took the papers to the ABC Imaging Company in Silver Spring to have a duplicate copy made for the undersigned counsel. However, ABC Imaging botched the copying job and lost approximately half of the records. Hall requested that NSA provide a duplicate set. There is no dispute that Hall subsequently sought to have the NSA records produced in digital form, although there appear to be differences as to when and how NSA responded.

4. On Wednesday, June 6th, in the presence of his client, the undersigned spoke with NSA's counsel about immediately providing digital copies of these records in word-searchable pdf format. NSA's counsel was

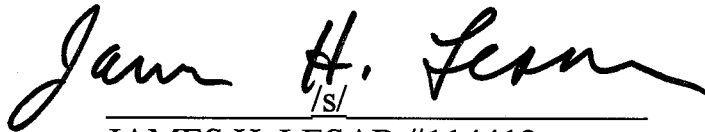
given mailing addresses for both the undersigned counsel and Hall. They heard nothing further until a single Xerox copy in a Fedex package was delivered to the undersigned counsel's office on Tuesday, June 12th. This was immediately taken to Fedex/Kinko's Silver Spring, Maryland and two CDs were run off at a cost of \$174.00. NSA did not charge Hall for the approximately 600 pages of documents it provided on June 12, which NSA says took four hours to copy. The undersigned has been advised that after their conversation on June 6th, NSA's counsel contacted its FOIA office to determine whether it could comply with the request to provide the records in digital format and was advised that it was too complicated and time-consuming to put the records on CDs in time to get them to Hall and arrive via Fedex at the undersigned's address on June 12th.

5. In addition to this problem, plaintiff Hall faces other difficulties in meeting the June 15th deadline. On June 14th he will be attending an annual two-day meeting of the National Alliance of POW/MIA Families, at which he will speak regarding the status of this case. He will not be available to work on this case again until the afternoon of June 16th.

6. Defendant's time to file a reply should be extended to and including July 6, 2012.

7. Defendant consents to the relief requested by plaintiffs.

Respectfully submitted,


/s/

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Counsel for Plaintiff AIM, Inc.

Dated: June 13, 2012

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	:	
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ORDER

Upon consideration of plaintiffs' unopposed motion for an extension of time to respond to the CIA's supplemental motion regarding Items 4 and 5, and the entire record herein, it is by this Court this _____ day of June, 2011, hereby

ORDERED, plaintiffs opposition shall be due on or before June 20, 2012, and it is further

ORDERED, that defendant shall have to and including July 6, 2012,
to file a reply.

UNITED STATES DISTRICT COURT