

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, <u>et al.</u> ,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	C. A. No. 04-0814 (RCL)
	:	
CENTRAL INTELLIGENCE	:	
AGENCY,	:	
	:	
Defendant	:	

DECLARATION OF ROGER HALL IN SUPPORT  
OF MOTION FOR PARTIAL SUMMARY JUDGMENT

I, Roger Hall, declare and say as follows:

1. I am a plaintiff in the above-entitled cause of action.
2. I suffered a stroke on or about June 5th, 2011. This left a lasting disability to my left arm and leg. I cannot lift my left arm more than 12 inches. I cannot use my left hand to do anything other than to grip. I can use it to pull up my pants, hold a can to open a pop top lid so I can open it with my right hand.
3. I have no ability to manipulate papers with my left hand or even to pass paper from one hand to the other. This makes reviewing documents difficult, even more so when pages are stuck together. Taking notes

regarding these documents requires me to put the paper down to write the notes instead of holding the paper in my left hand while writing. This is completely foreign to my reading and writing ability.

4. On or about May 20, 2013, the CIA provided me with seven folders with papers from the files of a Mr. Ritter totaling over 1,500 pages. The weight of the Ritter files in the box and the box itself made it extremely difficult for me to handle and maneuver while reviewing them. In two productions made in June, 2013, the CIA provided approximately 1,500 more pages of paper records which were equally difficult to handle.

5. I requested that the records at issue be produced to me in word searchable pdf format before they were produced in hard copy form.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of July, 2013.

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ROGER HALL