## 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 :

## UNOPPOSED MOTION LEAVE TO FILE REPLY TO CIA'S OPPOSITION TO MOTION FOR PARTIAL SUMMARY JUDGMENT OUT-OF-TIME

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 leave to file their reply to defendant Central Intelligence Agency's opposition to plaintiff's motion for partial summary judgment on the issue of whether the CIA must provide records to Hall in word searchable electronic format out-of-time.

As grounds for this motion, Hall represents to the Court as follows:

- 1. Hall has previously filed unopposed motions for extensions of time to file the Reply, most recently to and including August 19, 2013. To date these motions have not been acted upon.
- 3. On Monday, August 19, the undersigned counsel, James H. Lesar, suffered intense and extensive body pain, particularly of the lower back and legs. This made it impossible for him to accomplish very much that day. Also, the computer expert he had retained to file a declaration in this case was unable to continue work on his declaration that day for medical reasons. Plaintiffs' counsel's problem in being able to accomplish much work due to severe body ain abated on Tuesday, but still continued. On Wednesday, August 21, 2013, after a visit to his physical therapist, his condition improved markedly and he was able to work pretty much full throttle the rest of the day and night.
  - 4. Defendant does not oppose this motion.

Respectfully submitted,

JAMES H. LESAR #114413

1003 K Street, N.W.

Suite 640

Washington, D.C. 20001

Phone: (202) 393-1921

Counsel for Plaintiffs

3

Roger Hall and SSR, Inc.

Dated: August 22, 2013

John Clarke D.C. Bar #388599

1629 K Street, Suite 300

Washington, D.C. 20006

Phone: (202) 332-3030

Counsel for Plaintiff AIM, Inc.

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al., :

:

Plaintiffs,

: Civil Action No. 04-0814 (RCL)

:

CENTRAL INTELLIGENCE :

v.

AGENCY

:

Defendant :

## ORDER

Upon consideration of plaintiffs' unopposed motion for leave to file their Reply out- of- time, and the entire record herein, it is by this Court this \_\_\_\_\_ day of August, 2013, hereby

ORDERED, that plaintiffs' motion for leave to file their Reply out-of-time BE, and hereby IS, GRANTED.

UNITED STATES DISTRICT COURT