

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

RESPONSE TO ORDER TO SHOW CAUSE

On January 29, 2016, this Court issued an order requiring plaintiffs to show cause why this case should not be dismissed. Plaintiffs respond to the Court as follows:

1. On January 26, 2015, the parties filed a Joint Request for a Scheduling Order. It provided that “the parties will shortly submit a joint report regarding a schedule for submission of defendants’ Vaughn index and renewed motion for summary judgment.” Doc. 221.

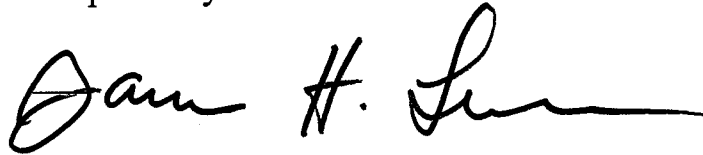
2. On January 11, 2015, Roger Hall’s counsel, James H. Lesar, emailed a list of 87 sample Vaughn index documents. Under the procedure agreed to by counsel for the parties, the CIA was to provide an informal Vaughn index, after which plaintiff Roger Hall would indicate the extent to which he wished to contest issues raised by the index.

3. Counsel for the CIA has committed the CIA to provide the informal sample Vaughn index by February 26, 2016. He has also committed to providing plaintiffs with an inventory providing a brief description of the entirely withheld documents by February 26, 2016.

4. Plaintiffs will respond to this informal Vaughn index on or before March 26, 2016.

5. On or before April 5, 2016, the parties will submit a joint report setting forth a schedule for the filing of a formal Vaughn index and defendant's dispositive motion and plaintiffs' response thereto.

Respectfully submitted



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/s/

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Dated: February 11, 2016