

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al.,

Plaintiffs

v.

CENTRAL INTELLIGENCE
AGENCY,

Defendant

C. A. No. 04-0814 (RCL)

CONSENT MOTION TO EXTEND TIME TO SUBMIT AN INFORMAL
RESPONSE TO DEFENDANT’S DRAFT SAMPLE VAUGHN INDEX
AND INVENTORY OF DOCUMENTS WITHHELD IN FULL AND TO
FILE JOINT REPORT REGARDING FUTURE BRIEFING SCHEDULE

Plaintiffs Roger Hall and Studies Solutions Results, Inc. (“SSR, Inc.”) move the Court for an extension of time, to and including April 11, 2016, to file their informal response to (1) the CIA’s draft sample Vaughn index of partially withheld documents, and (2) the CIA’s draft inventory of documents withheld in full.

Plaintiffs further move the Court to extend the time to file a Joint Report regarding a future briefing schedule to and including April 21, 2016.

Plaintiff Accuracy in Media, Inc. (“AIM”) joins in this motion.

As grounds for this motion, plaintiffs represent to the Court as follows:

1. On January 11, 2016, Hall's counsel, James H. Lesar, emailed a list of 87 Vaughn sample index documents to counsel for the CIA. Under the procedure agreed to by counsel for the parties, the CIA was to provide an informal Vaughn index, after which plaintiff Hall would indicate the extent to which he wished to contest issues raised by the index.

2. On January 29, 2016, this Court ordered plaintiffs to show cause why this case should not be dismissed. In response to this Order, Doc. 240, Counsel for the CIA committed the CIA to provide an informal Vaughn sample index and an inventory by February 26, 2016. The parties also advised the Court that by March 26, 2016, plaintiffs would provide to the CIA their response to the draft Vaughn index. The parties further advised the Court that by April 5, 2016, they would submit a joint report setting forth a schedule for the filing of a formal Vaughn index, defendant's dispositive motion, and plaintiffs' response thereto.

3. Plaintiff Roger Hall has suffered a series of injuries which have greatly reduced his ability to work quickly. In 2013 he suffered a stroke which required him to increasingly rely upon a wheelchair. In October 2014, a driver ran into his wheel chair as he was crossing the street to enter his apartment. In December 2015 when he was being transported home from an appointment by a Metro van, the driver drove the van in a reckless

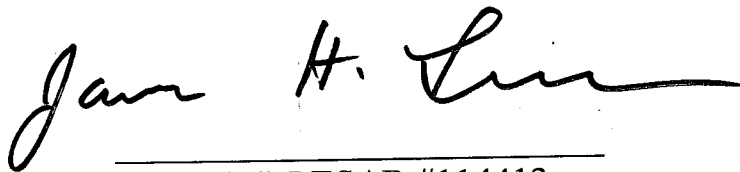
manner, flinging him around and causing a serious and excruciating injury to his back and spine. This greatly reduced his ability to work on this case.

4. Over the past several months, Hall had repeatedly experienced problems with his Microsoft computer. After many attempts at fixing the computer, Dell replaced the computer on March 19, 2016.

5. In light of the foregoing circumstances, plaintiffs needs an extension of time to respond to the CIA's sample Vaughn index.

6. Defendants consent to this motion.

Respectfully submitted



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ORDER

Upon consideration of the motion of plaintiffs' Roger Hall and Studies Solutions Results, Inc. for an extension of time to submit their informal response to defendants' sample Vaughn index of partially withheld documents and inventory of documents withheld in full, defendant's consent thereto, and the entire record herein, it is by this Court this _____ day of March, 2016, hereby

ORDERED, that plaintiffs' motion BE, and HEREBY IS, GRANTED, and it is further

ORDERED, that the parties shall file a Joint Report regarding a proposed schedule for the filing of defendant's formal Vaughn index, the filing of its dispositive motion, and plaintiff's response thereto shall be due on or before April 21, 2016,

UNITED STATES DISTRICT JUDGE