

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 04-814 (RCL)
)	
CENTRAL INTELLIGENCE AGENCY,)	
)	
Defendant.)	
_____)	

PLAINTIFFS' UNOPPOSED MOTION FOR ENLARGEMENT OF TIME
TO FILE REPLIES IN RESPONSE TO DEFENDANT'S OPPOSITION
TO PLAINTIFFS' CROSS-MOTIONS FOR SUMMARY JUDGMENT

COME NOW plaintiffs Roger Hall, Studies Solutions Results, Inc., and Accuracy in Media, Inc., by counsel, under Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, and respectfully move this Court for an enlargement of time to file their Replies to defendant CIA's Opposition to plaintiffs' cross-motions for Summary Judgment. Defendant CIA consents to this relief.

Memorandum of Points and Authorities

1. By Order entered on February 16, 2016 (Docket No. 274), the Court granted the Plaintiffs' Motion to enlarge the time to submit their memoranda in reply to defendant's oppositions to plaintiffs' dispositive motions, to February 27, 2017.

2. On February 27, plaintiffs submitted their unopposed motion to extend that deadline to March 14. Docket No. 275. As previously reported in that pleading, plaintiffs' counsel James H. Lesar has been in the hospital in critical condition twice in the past five weeks. He was released in much improved condition on February 24, 2017. However, he continues to be in a weakened condition. The week after his discharge he had two medical

appointments each day from February 25 through February 27, 2017. Some days he is able to accomplish almost no work. New developments have required some immediate attention. He remains under an injunction not to work for extended periods of time in front of his computer. Additionally, his goddaughter has arrived on a previously planned visit from out-of-state and will be staying with him the next three days. In view of these circumstances, counsel needs an extension of time to and including March 28 within which to file his reply brief.

3. Under Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, *Extending Time*, "the court may, for good cause, extend the time... if a request is made, before the original time or its extension expires..."

4. Given Mr. Lesar's medical condition, he will need an additional 14 day extension of time beyond the due date of February 27, to March 14, 2017

WHEREFORE, plaintiffs respectfully seek an extension of time to and including March 14, 2017, to submit their Reply Memoranda to defendant's oppositions to plaintiffs' cross-motions for summary judgment.

DATE: March 10, 2017.

Respectfully submitted,

/s/
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