

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ROGER HALL, <i>et al.</i>,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No.: 04-0814 (HHK)
)	
CENTRAL INTELLIGENCE AGENCY,)	ECF
)	
Defendant.)	

**CONSENT MOTION FOR ENLARGEMENT OF TIME
TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

Defendant respectfully moves this Court for an enlargement of time within which to answer or otherwise respond to the Complaint in this matter.

On April 13, 2005, the Court denied the Parties' various pending motions (Docket # 30), including Defendant's motions to dismiss (Docket ## 5, 17). Accordingly, Defendant's answer or other response is currently due on April 27, 2005, pursuant to Fed. R. Civ. P. 12(a)(4)(A). On April 19, 2005, the Court also set a Status Conference for May 27, 2005. In addition, counsel for Plaintiffs Hall and SSRI has indicated that Plaintiffs are considering filing a motion for reconsideration, and may file a separate non-dispositive motion on another matter (either or both of which undersigned counsel indicated that Defendant would oppose).

Because a decision on reconsideration or other non-dispositive motion could affect the scope of Defendant's responsive pleading and otherwise affect the processing of the underlying Freedom of Information Act request, Defendant moves for additional time to answer or otherwise respond to Plaintiff's Complaint until 20 days after the Court's decision on any motion for reconsideration or other non-dispositive motion that Plaintiffs may file or 20 days after the Status Conference, presently scheduled for May 27, 2005, whichever date is later.

Undersigned counsel has conferred with Plaintiffs' counsel, who have consented to this request for enlargement.

WHEREFORE, it is respectfully requested that the time for Defendant's Answer or other response to the Complaint be enlarged to 20 days following the Court's decision on any motion for reconsideration or other non-dispositive motion that Plaintiffs may file or 20 days following the Status Conference, presently scheduled for May 27, 2005, whichever date is later.

A proposed Order is attached.

Respectfully submitted,

/ s /

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/ s /

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