

**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	:	

**MOTION OF PLAINTIFFS ROGER HALL AND STUDIES
SOLUTIONS RESULTS, INC TO REVISE
BRIEFING SCHEDULE BY TWO BUSINESS DAYS**

**Plaintiffs Roger Hall (Hall) and Studies Solutions, Inc.
(SSRI, Inc.)(collectively “Hall”), move the Court for an
extension of time, to and including December 24, 2018,
within which to file their cross-motion for partial summary**

judgment and other relief and in opposition to the pending motion of defendant Federal Bureau of Investigation and the U.S. Department of Justice (DOJ or FBI or “Government”).

By this Court’s order issued December 13, 2018, Hall’s brief was due December 14, 2015. On December 14, 2018, Hall moved for 4 business days extension, to and including December 20, 2018. That motion has not yet been acted upon.

The other plaintiff in this case, Accuracy in Media (AIM), filed its Renewed Cross-Motion for Summary Judgment and Other Relief on December 14, 2018.

The Government’s counsel, AUSA Damon Taaffe, has advised that the defendants take no position on this motion. AIM consents to this motion.

Due to many new events and developments, Hall is unable to meet his previously proposed deadline.

The new developments in the Court of Appeals include the filing on Monday, December 17, 2018, in Morley v. CIA, D.C. Cir. No. 17-5114, of motions to withdraw the mandate, to stay the mandate, and to reconsider the Court's *per curiam* orders denying Morley's petition for rehearing and petition for rehearing *en banc*.

On December 14, 2018, Hall's counsel filed a motion in David Talbot v. C.I.A. and Department of State. Civil Action No. 17-588 (D.D.C.)(CRC) which he spent substantial time in the days preceding its filing reviewing and editing the work of the lead counsel, Dan Hardway.

On December 18, 2018, Hall's counsel filed a Notice of Filing at 2:30 AM in Clemente v. F.B.I. Civil Action No. 13-0108 (D.D.C.)(TFH), which was submitted in preparation for a lengthy hearing that took place later that morning from roughly 10:00 to 11:30 AM.

Attorney Lesar has also spent time recently working on Objections to Magistrate Harvey's Report and Recommendation in C.A. No. 17-160 (D.D.C. (TNM), which will be filed shortly.

A new decision by this Court on December 6, 2018 in Judicial Watch, Inc. v. Dept. of State, C.A. No. 14-1242 (D.D.C.)(RCL) dealt with issues regarding discovery in FOIA cases involving potential bad faith or negligent conduct which had to be studied for its relevance to issues raised in this case. Other new FOIA decisions which may be relevant to this case have been issued in the past few days.

Counsel also had a medical appointment on Wednesday December 19th and because of a variety of other daily life interruptions and prolonged and painful arthritis and fatigue, was unable to commence writing the brief due in this case until late evening on December 19th. He made substantial

progress but needs another two business days to complete his brief.

During the course of writing this motion, attorney Lesar was advised by another attorney that Monday, December 24, 2018 has been declared a federal holiday. In view of this, the proposed order attached hereto specifies December 26, 2018 as the actual due date.

The proposed revised briefing schedule extends the Government's and AIM's dates to respond commensurately.

/s/
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**Counsel for Roger Hall and
Studies Solutions Results, Inc.**

Dated: December 20, 2018