

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

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

**MOTION OF PLAINTIFFS ROGER HALL  
AND STUDIES SOLUTIONS RESULTS,  
INC TO FURTHER REVISE BRIEFING SCHEDULE**

**Plaintiffs Roger Hall (Hall) and Studies Solutions, Inc.**

**(SSRI, Inc.)(collectively “Hall”), move the Court for an  
extension of time to file their renewed cross-motion for  
summary judgment and other relief. As grounds for this  
motion, Hall states to the Court as follows:**

**On December 20, 2018, this Court issued an order granting Hall's motion to extend his time for filing Hall's renewed cross-motion for summary judgment by two business days, to and including December 24, 2018.**

**President Trump issued an order declaring December 24<sup>th</sup> a federal holiday. D.C. District Court Judge Beryl Howell issued an order declaring that December 24<sup>th</sup> would be a federal holiday and that Court would be closed for all except criminal cases and a very select category of civil cases.**

**This Court has not yet acted on the motion Hall filed on December 20, 2018.**

**Early this morning, December 26, 2018, Hall's counsel advised AUSA Damon Taaffe that he was unable to meet today's proposed deadline. AUSA Taaffe responded by stating, "we will take no position on any future extension requests but ask that you set the reply deadline for**

**oppositions to both plaintiffs' filings for 30 days after you file. With the lapse in federal funding, I'm furloughed and may be unable to communicate further on this." In view of this and the fact that it has been much more difficult to work on this case through the holidays that undersigned counsel had imagined when he proposed the December 26, 2018 deadline, the undersigned counsel now seeks an extension to and including January 3, 2019 to file Hall's motion. Previously, in response to an inquiry from the undersigned counsel about his response to a further request for an extension of time, AUSA Taaffe's office had sent out an automatic reply email advising that Taaffe would be out of the office on annual leave until Jan. 3, 2019.**

**In view of these circumstances, it makes sense to allow Hall the additional time he seeks to complete his response to the Government's renewed motion, and to extend the**

**furloughed counsel's time to respond by 30 days. In this regard, undersigned counsel notes that the Justice**

**Department's website states:**

**Civil litigation will be curtailed or postponed to the extent that this can be done without compromising to a significant degree the safety of human life or the protection of property.**

**Attorney Lesar has experienced a number of unforeseen difficulties in working on his brief over the Christmas holidays. For example, he lost his cell phone power cord and spent a couple of hours searching for it and another hour consulting with his wife on purchase of a new one. And he had financial matters to be taken care of. He cancelled today's appointment with his physical therapist so he could use the time to work on this case. Most of Sunday he was unable to work because of arthritic pain and fatigue. However, he has continued to work throughout the holidays**

**to the extent possible given his circumstances. He has now worked on rough drafts of two sections and has two more in mind.**

**Respectfully submitted**

**/s/**

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

**Dated: December 26, 2018**