

**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	:	

**CONSEN MOTION OF PLAINTIFFS ROGER HALL
AND STUDIES SOLUTIONS RESULTS, INC. TO
TO REVISE BRIEFING SCHEDULE BY ONE DAY**

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

**(SSRI, Inc.)(collectively “Hall”), move the Court for ONE-DAY
extension of time to, and including Jan. 8, 2019, 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 January 3, 2019, Hall moved this Court for an extension of time to and including Jan. 7, 2019 within which to file his response to the CIA cross-motion for summary judgment.

This Court has not yet acted on the motion Hall submitted on January 3, 2019.

This afternoon Hall's counsel emailed AUSA Damon Taaffe requesting a one-day extension of time. He immediately received an automated email from AUSA Taaffe informing him he was on furlough and unable to respond. The auto note informed the undersigned counsel that if he needed to contact someone immediately he should phone Civil Chief Daniel Van Horne. He did, and Van Horne gave

his consent. Shortly afterwards, AUSA Taaffe also gave his consent.

The one-day extension is required in part because of continued formatting problems. Very substantial progress in writing the brief and editing was made despite these problems. However, this afternoon plaintiffs' counsel's progress was interrupted by fatigue and a painful lower back. He will not be able to complete the draft until later tonight or early in the morning. He then needs to have it read and approved by his client Roger Hall. After that is done, the undersigned counsel and AIM's counsel will need to spend 2-3 hours editing the final draft and inserting references to the record which have been omitted in the draft or are in error.

Respectfully submitted

 /s/

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

Dated: Jan. 7, 2019