

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al.,	:
	:
Plaintiffs,	:
	:
v.	: C. A. No. 04-814(RCL)
	:
CENTRAL INTELLIGENCE	:
AGENCY	:
	:
Defendant	:

SECOND RENEWED CROSS-MOTION FOR SUMMARY JUDGMENT
AND OTHER RELIEF BY PLAINTIFFS ROGER
HALL AND STUDIES SOLUTIONS, RESULTS, INC

Plaintiffs Roger Hall (“Hall”) and Studies Solutions Results, Inc. (“SSRI”)(collectively “Hall”), move this Court for Summary Judgment and Other Relief pursuant to Rule 56 of the Federal Rules of Civil Procedure (“Fed.R.Civ.P.”). In support of this motion plaintiffs submit a Memorandum of Points and Authorities and a Proposed Order. As their Local Rule 7.1(h) statement plaintiffs incorporate the prior Statements of Material Fact Not in Dispute (“SMF/NID”) submitted by Hall in his previous motions for summary judgment beginning in 2012 through the present. Also incorporated plaintiffs’ Local Rule7.1(h) statement of plaintiff Accuracy in Media (“AIM”), ECF No. 258-5 to the extent it relies upon facts stated in the affidavits submitted by Hall in AIM’s ECF #258 and Hall’s ECF #259.

Hall also moves the Court for an order to establish a Meet and Confer conference to plan a schedule for taking depositions and additional forms of discovery.

Respectfully submitted,

/s/

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Dated: January 8, 2019