

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

_____)	
ROGER HALL, ET AL.,)	
)	
Plaintiffs)	
)	
v.)	Civil Action No.: 04-814 (RCL)
)	
CENTRAL INTELLIGENCE AGENCY,)	
)	
Defendant)	
_____)	

**DEFENDANT’S MOTION FOR 14-DAY EXTENSION OF TIME TO
FILE ITS MOTION FOR SUMMARY JUDGMENT**

Defendant, the Central Intelligence Agency (CIA), respectfully moves the Court for a 30-day extension of time to file its reply in support of its motion for summary judgment and opposition to plaintiffs’ cross-motions for summary judgment. Plaintiffs have consented to the requested relief, in support of which defendant states as follows.

1. The CIA filed its renewed motion for summary judgment on November 29, 2017. *See* ECF No. 295.
2. Following a series of extensions, plaintiff Accuracy in Media filed its opposition (ECF No. 313) and cross-motion for summary judgment (ECF No. 312) on December 14, 2018. Plaintiff Hall filed his opposition (ECF No. 320) and cross-motion for summary judgment (ECF No. 319) on January 7, 2018. The CIA’s replies and oppositions to plaintiffs’ cross-motions currently are due on February 11, 2019.
3. Due to the 35-day government shutdown, undersigned counsel was furloughed for weeks after plaintiffs filed their pleadings. He returned to the office on Monday, January 28, but

the following week was consumed entirely by logistical burdens related to restarting approximately 40 cases that had been stayed during the shutdown.

4. Furthermore, undersigned counsel and agency counsel are both changing portfolios and their respective offices, and responsibility for this matter is transitioning to other attorneys. Due to the lengthy history of this lawsuit and the time that has elapsed since the CIA filed its renewed motions for summary judgment, additional time is needed to respond to plaintiffs' pleadings. The CIA requests a 30-day extension, through and including March 11, 2019, to file its responsive pleadings.

5. Pursuant to Local Civil Rule 7(m), undersigned counsel conferred with plaintiff's counsel, who consented to the requested relief.

For these reasons, the CIA requests that the Court extend its deadline for filing its replies and oppositions to plaintiffs' cross-motions for summary judgment to March 11, 2019. A proposed order is attached.

Respectfully submitted,

JESSIE K. LIU, D.C. Bar No. 472845
United States Attorney

DANIEL F. VAN HORN, D.C. Bar No. 924092
Chief, Civil Division

By: /s/ Damon Taaffe
DAMON TAAFFE
Assistant United States Attorney, Civil Division
D.C. Bar No. 483874
555 Fourth Street, N.W.
Washington, D.C. 20530
(202) 252-2544
damon.taaffe@usdoj.gov

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

<hr/>)	
ROGER HALL, ET AL.,)	
)	
Plaintiffs)	
)	
v.)	Civil Action No.: 04-814 (RCL)
)	
CENTRAL INTELLIGENCE AGENCY,)	
)	
Defendant)	
<hr/>)	

[PROPOSED] ORDER

Defendant’s consent motion for an extension of time to file its replies in support of its renewed motions for summary judgment and oppositions to plaintiffs’ cross-motions for summary judgment is GRANTED. Defendant shall file its responsive pleadings by March 11, 2019.

SO ORDERED.

Date

United States District Judge