

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al.,	:	
	:	
PLAINTIFFS,	:	
	:	
V.	:	C.A. No. 04-0814 (RCL)
	:	
CENTRAL INTELLIGENCE	:	
AGENCY	:	
	:	
DEFENDANT	:	

PLAINTIFFS’ UNOPPOSED MOTION TO
ENLARGE THE TIME WITHIN WHICH TO SUBMIT
MOTION FOR PARTIAL RECONSIDERATION OF THIS COURT’S
NOVEMBER 30, 2020 ORDER OF DISMISSAL WITH PREJUDICE

Come now the plaintiffs, Roger Hall, Studies Solutions Results, Inc., and Accuracy in Media, Inc. ("AIM"), under Rule 6(b) of the Federal Rules of Civil Procure, and respectfully move this Court for a sixty-day extension of time, to and including February 27, 2021, to move for partial reconsideration of its November 30, 2020 “Order and Judgment,” dismissing this case with prejudice. Defendant CIA consents to the relief sought. As grounds for this motion, plaintiffs’ submit the following.

On November 30, 2020, the Court issued an "Order and Judgment," dismissing this case "with prejudice." The Court also directed the parties to meet and confer concerning possible settlement of the attorney fees issue. Through their

attorney, James H. Lesar (Lesar), Plaintiffs Roger Hall and Studies, Solutions, Results, Inc. (SSRI), immediately contacted John H. Clarke, attorney for plaintiff AIM, regarding preparation of a motion for partial reconsideration of the Court's November 30, 2020 Order, ECF No. 353. The motion for reconsideration is due by December 28, 2020.

Before any substantial work had been done by either Messrs. Lesar or Clarke on a motion for reconsideration, Mr. Lesar developed a very sore throat, and difficulty swallowing. He was ordered to be tested for COVID-19. The test result was positive.

This result has greatly hampered the amount of productive work Mr. Lesar can do. He cannot leave the Crescent Condominium building. He is forbidden from going to Fedex/Kinko's to make needed shipments. He cannot go to restaurants or grocery stores or the pharmacy.

In light of these and other circumstances, including being nearly blind, Mr. Lesar is compelled to ask for a COVID-19 extension of time in the amount of 60 days, or such lesser amount as this Court may deem appropriate, in order to properly prepare a motion to reconsider this court's November 30, 2020 ruling.

This motion does not at present impact on the submission of a Joint Status Report on attorney fees issues, which the parties are scheduled to file on or before January 29, 2021.

CONCLUSION

For the reasons set forth above, Plaintiffs pray that this Court grant their unopposed motion for a COVID-19 extension of time within which to move for reconsideration of this Court's November 30, 2020 Order and Judgment dismissing this case with prejudice.

Date: December 17, 2020.

Respectfully submitted,

/s/

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