

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

**JOINT MOTION FOR AN EXTENSION OF TIME TO
FILE A STATUS REPORT REGARDING ATTORNEYS’ FEES**

Defendant Central Intelligence Agency (“CIA”) and Plaintiffs Hall, Studies Solutions Results, Inc., and Accuracy in Media, Inc., by and through undersigned counsels, respectfully request, pursuant to Federal Rule of Civil Procedure 6(b)(1), for an enlargement of time to file their Joint Status Report regarding attorneys’ fees.

On November 30, 2020, the Court ordered the parties to meet and confer regarding attorneys’ fees and to file a status report on January 29, 2021, addressing the potential for settlement and proposing a schedule for any fee litigation that may be required. *See* ECF. No. 353.

On January 27, 2021, Plaintiff Accuracy in Media, Inc. sent the CIA an itemization of its hours. On January 27, 2021, Plaintiffs Hall and Studies Solutions Results, Inc. sent a preliminary itemization of their hours, they are gathering additional billing statements from others who worked on the case. Plaintiffs Hall and Studies Solutions Results, Inc. intend to provide the CIA with an updated itemization by the end of next week. The CIA will need some time to review the itemizations provided by the Plaintiffs. The additional time is also needed for

the parties to further confer and hopefully reach an agreement as to avoid any further litigation related to this matter.

Accordingly, based on the above, the parties respectfully request that they be afforded an additional thirty (30) days up to and including March 1, 2021, to file their status report addressing the potential for settlement and proposing a schedule for any fee litigation if necessary. A proposed order is attached.

Dated: January 28, 2021

Respectfully submitted,

/s/ James H. Lesar

James H. Lesar, Bar No. 114413
Counsel for plaintiffs Roger Hall and
Studies Solutions Results, Inc.
930 Wayne Avenue
Unit 1111
Silver Spring, MD 20910
(301) 328-5920
jhlesar@gmail.com

/s/ John H. Clarke

John H. Clarke, Bar No. 388599
Accuracy in Media, Inc.
1629 K Street, NW
Suite 300
Washington, DC 20006
(202) 344-0776
Fax: (202)332-3030
johnhclarke@earthlink.net

Counsel for Plaintiffs

MICHAEL R. SHERWIN
Acting United States Attorney

BRIAN P. HUDAK
Acting Chief, Civil Division

By: */s/ Kathleene Molen*
KATHLEENE MOLEN
Assistant United States Attorney
555 4th Street, N.W.
Washington, District of Columbia 20530
(202) 803-1572
Kathleene.Molen@usdoj.gov

Counsel for Defendant