

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.	)	
_____	)	

PLAINTIFFS' UNOPPOSED MOTION FOR ENLARGEMENT  
OF TIME WITHIN WHICH TO FILE MOTION TO RECONSIDER  
THE COURT'S NOVEMBER 30, 2020 ORDER AND JUDGMENT

COME NOW plaintiffs Roger Hall, Studies Solutions Results, Inc. ("SSRI"), and Accuracy in Media, Inc. ("AIM"), by counsel, under Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, and respectfully move this Court for a 21-day enlargement of time to file their Motions to Reconsider the Court's November 30, 2020 Judgment and Order, until April 20, 2021. Defendant CIA does not oppose the relief sought.

Memorandum of Points and Authorities

1. By Order entered on November 30, 2020, the Court entered its Order and Judgment, terminating this case. ECF No. 353.
2. By Order entered on December 18, 2020, the Court granted plaintiffs' motion for enlargement of time to submit their motions to reconsider its Order and Judgment, setting Saturday, February 27, 2021, as plaintiffs' due date. ECF No. 355. By Order entered on March 3, 2021, the Court granted plaintiffs' motion for enlargement of time to submit their motions to reconsider its Order and Judgment, setting March 30, 2021, as plaintiffs' due date. ECF No. 360.

3. Under Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, *Extending Time*, "the court may, for good cause, extend the time... if a request is made, before the original time or its extension expires..." The facts and reasons set forth below establish that there is good cause for the Court to grant this unopposed motion.

4. James H. Lesar, counsel for plaintiffs Hall and SSRI, faces immediate time deadlines in several other cases which have impeded his ability to timely prepare a properly supported motion for reconsideration in this longstanding complex case with a voluminous factual record. Mr. Lesar's Declaration regarding recent developments in cases that demand his immediate attention is submitted herewith and incorporated herein.

5. Due to the press of other matters, AIM's counsel, John H. Clarke, has also been unable to devote sufficient time to complete AIM's motion to reconsider.

#### CONCLUSION

For the reasons set forth above, plaintiffs respectfully seek an extension of time to and including April 20, 2021, to submit their Motion to Reconsider the Court's December 18, 2020, Order and Judgment.

DATE: March 30, 2021.

Respectfully submitted,

\_\_\_\_\_/s/  
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