

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

**CONSENT MOTION FOR AN EXTENTION OF TIME
TO RESPOND TO PLAINTIFFS’ MOTIONS FOR RECONSIDERATION**

Defendant Central Intelligence Agency (“CIA”), pursuant to Federal Rule of Civil Procedure 6(b)(1), respectfully requests an extension of time of four (14) days, to respond to Plaintiffs’ Motions for Reconsideration filed on April 20, 2021. (ECF Nos. 364 and 365)

BACKGROUND INFORMATION

1. On November 30, 2020, the Court granted “the government’s motion for summary judgment and order[ed] this case dismissed with prejudice.” (ECF No. 353)
2. On April 20, 2021, Plaintiffs filed Motions for Reconsideration. (ECF Nos. 364 and 365)
3. The CIA’s response is currently due on May 4, 2021.

BASIS FOR EXTENSION REQUEST

4. The undersigned counsel is juggling a number of competing deadlines that have been moved and concentrated to this week and the following week in her eighty-five other FOIA and Immigration cases. Although undersigned counsel has been consistently working 70-80 hours per week, she has been unable to find the time to meet this May 4, 2021, deadline.

ADDITIONAL REQUIRED INFORMATION

5. Granting this motion will not affect any other deadlines.

6. Pursuant to Local Civil Rule 7(m), the undersigned counsel has reached out to Plaintiffs' counsel, who consent to this fourteen (14) day extension of time.

WHEREFORE, based on the foregoing, Defendant respectfully requests that the Court grant this motion seeking an extension of time of fourteen (14) days, up to and including May 18, 2021, to respond to Plaintiffs' Motions for Reconsideration. A proposed order is attached.

Dated: April 30, 2021

Respectfully submitted,

CHANNING D. PHILLIPS
D.C. Bar # 415793
Acting United States Attorney

BRIAN P. HUDAK
Acting Chief, Civil Division

By: /s/ Kathleene Molen
KATHLEENE MOLEN
VA Bar #68460
Assistant United States Attorney
555 4th Street, N.W.
Washington, District of Columbia 20530
(202) 803-1572
Kathleene.Molen@usdoj.gov

Counsel for Defendant