

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	
ROGER HALL, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civ. Action No. 04-814 (RCL)
	)	
CENTRAL INTELLIGENCE AGENCY,	)	
	)	
Defendant.	)	
_____	)	

**MOTION FOR AN EXTENSION OF TIME FOR DEFENDANT TO FILE ITS  
OPPOSITION TO PLAINTIFF ACCURACY IN MEDIA’S CROSS-MOTION FOR  
SUMMARY JUDGMENT AND REPLY IN FURTHER SUPPORT OF SUMMARY  
JUDGMENT**

Defendant, the Central Intelligence Agency, by and through undersigned counsel, respectfully moves the Court for an extension of time, up to and including April 11, 2022, within which to file an opposition to Plaintiff Accuracy in Media’s Cross-Motion for Summary Judgment and a reply in further support of summary judgment. Pursuant to the Order of this Court dated February 15, 2022, Defendant’s reply is due on March 10, 2022.

**LOCAL RULE 7(m) STATEMENT**

Pursuant to Local Civil Rule 7(m), undersigned counsel consulted with counsel for Plaintiff Accuracy in Media, John Clarke, regarding the relief requested in this motion, and he kindly assented. As of the filing of this motion, attempts to speak via telephone with James H. Lesar, counsel for Plaintiffs Roger Hall and Studies, Solutions, Results, Inc., regarding this motion, have not been successful, and a response to an email has not been received.

**ARGUMENT**

There is good cause for the granting of this requested extension.

1. Undersigned counsel is a relative newcomer to this case, having entered his appearance on November 12, 2021. ECF No. 374.

2. Undersigned counsel promptly filed a motion for summary judgment on December 21, 2021 (ECF No. 376), as ordered by the Court on November 23, 2021. ECF No.375. Pursuant to that order of the Court, Plaintiffs were to file their response and any cross-motions by January 25, 2022.

3. Plaintiff Accuracy in Media filed an opposition and cross-motion for summary judgment on January 25, 2022. ECF Nos. 377 and 378.

4. On February 4, 2022, Plaintiffs Roger Hall and Studies Solutions Results, Inc., moved, with consent, for an extension of time within which to file their oppositions to Defendant's motion for summary judgment. ECF No. 379.

5. On February 15, 2022, this Court allowed the Plaintiffs' motion and ordered: 1) Plaintiffs to file their response and any cross-motion by February 17, 2022; 2) Defendant to file its response to the cross-motions and replies in further support of summary judgment by March 10, 2022; and 3) Plaintiffs to file a reply by March 24, 2022. ECF No. 380.

6. To date, Plaintiffs Roger Hall and Studies Solutions Results, Inc. have not filed any response or cross-motion to Defendant's motion for summary judgment.

7. Undersigned counsel had been waiting for the anticipated filings by Plaintiffs Roger Hall and Studies Solutions Results, Inc., so Defendant's oppositions and replies could be handled in one filing.

8. The office of the United States Attorney, Civil Division, after several delays, is presently in the process of moving its offices and we are being required to pack all Civil Division files, IT equipment, and computer monitors and prepare for the move which is taking place over the next

two weeks. The office phones have also been disconnected during this process.

9. Undersigned counsel is assisting the office move as a move captain, and the situation is creating some turmoil with the work schedule and the attorneys are unable to work in the office during this two-week move period.

10. In addition, undersigned counsel has an extremely active litigation caseload and has been assigned in excess of 100 cases, and also emergency matters.

11. Undersigned counsel was hoping to file Defendant's oppositions and replies by the present due date but given the non-filings by Plaintiffs Roger Hall and Studies Solutions Results, Inc., coupled with the office move and the heavy caseload, it would be difficult to finalize an opposition and reply to Plaintiff Accuracy in Media's cross-motion by the current due date.

Based on the foregoing, it is respectfully requested that Defendant be given until April 11, 2022, to file its opposition to Plaintiff Accuracy in Media's cross-motion for summary judgment and reply in further support of summary judgment. A proposed form of order is submitted herewith.

March 9, 2022

Respectfully submitted,

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United States Attorney

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**[PROPOSED] ORDER**

This matter, having come before the Court on the Motion of Defendant for an extension of time within which to file an opposition to Plaintiff Accuracy in Media’s cross-motion for summary judgment and reply in further support of Summary Judgment, and the Court having considered the motion, it is hereby ORDERED,

That Defendant’s motion is granted and the Defendant shall file its opposition to Plaintiff Accuracy in Media’s cross-motion for summary judgment and reply in further support of Summary Judgment on or before April 11, 2022.

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ROYCE C. LAMBERTH  
UNITED STATES DISTRICT JUDGE