

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, <u>et al.</u> ,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Civil Action No. 04-0814 (HHK)
	:	
CENTRAL INTELLIGENCE AGENCY,	:	
	:	
Defendant	:	

PLAINTIFFS' MOTION FOR AN EXTENSION OF TIME TO RESPOND
TO DEFENDANT'S MOTION FOR PARATIAL SUMMARY JUDGMENT

Plaintiffs hereby move the Court for an extension of time to respond to defendant's motion for partial summary judgment, to and including 21 daus after the completion plaintiffs' dis-covery or, alternatively, if the Court grants defendant's preinding motion for a protective order, until 21 days after the order denying said motion.

As grounds for this motion, plaintiffs state to the Court as follows:

1. Plaintiffs response to defendant's motion for partial summary judgment is presently due November 13, 2006.

2. Plaintiffs contend that discovery on the issue of the adequacy of the search for materials responsive to Item 6 of their request should be had before they respond to defendant's motion for summary judgment as this will be the most efficient way of proceeding.

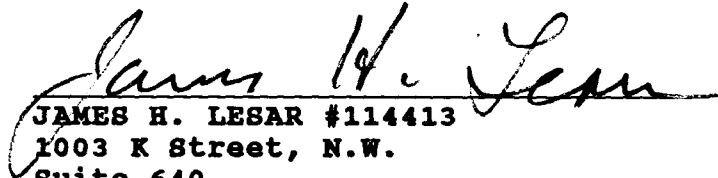
3. If the Court grants the motion for a protectiv e order, counsel for the parties will need additional time in any event be-

cause other work has so far precluded any substantial amount of time being allocated to that task.

4. Counsel for plaintiffs Roger Hall and Studies Solutions Results, Inc. is authorized to state that the other plaintiff, Accurancy in Media, joins in this motion.

5. Counsel for plaintiff left a message for counsel for defendant on her voice mail on Friday morning, November 10th regarding her client's position on this motion, but it has not been returned.

Respectfully submitted,



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Counsel for Plaintiffs
Roger Hall and SSRI

Dated: November 13, 2006

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 :
 Defendant :

Upon consideration of plaintiffs motion for an extenstion of time to respond to defendant's motion for summary judgment, and the entire record herein, it is by the Court this _____ day of November, 2006

ORDERED, that plaintiffs' shall have until _____
_____ to respond to defendant's motion for partial summary judgment.

UNITED STATES DISTRICT JUDGE