

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ROGER HALL, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No.: 04-0814 (HHK)
)	
CENTRAL INTELLIGENCE AGENCY,)	ECF
)	
Defendant.)	
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**CONSENT MOTION FOR EXTENSION OF
TIME TO OPPOSE DISPOSITIVE MOTIONS**

Defendant, through and by undersigned counsel, hereby submits this Motion for Extension of Time to oppose Plaintiff Hall’s motion for summary judgment and Plaintiff Accuracy in Media’s (AIMs) cross-motion for summary judgment. Defendant requests an extension until and including July 30, 2007.

1. Oppositions to dispositive motions are due on May 31, 2007.
2. Defendant requires an additional 60 days to prepare its oppositions to plaintiffs’ dispositive motion because of the voluminous nature of the papers filed by the plaintiffs, including AIM’s statement of material facts, which consists of ninety-six paragraphs and Mr. Hall’s statement of material facts, which includes forty-two paragraphs. In addition, lead counsel for defendant was suddenly taken ill on May 21, 2007, and was hospitalized briefly following emergency surgery. Moreover, if her health allows, defense counsel will be out of the country during the first two weeks in June.

3. Pursuant to Local Rule 7(m) the parties have conferred. Upon information and belief, Plaintiffs' counsels consent to this motion.

4. Upon information and belief this is the first request for an extension made for this deadline.

5. Defendant therefore requests an additional 60 days to file its oppositions to plaintiffs' dispositive motions.

WHEREFORE, Defendant requests that this enlargement be granted, and that the date for the filing of its oppositions to dispositive motions be extended to July 30, 2007. A minute order is requested.

Respectfully submitted,

Dated: May 24, 2007.

_____/s/
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