

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

)) ROGER HALL, <u>et al.</u>,)) Plaintiffs,)) v.) Civil Action No. 1:04-cv-00814-HHK) CENTRAL INTELLIGENCE AGENCY,)) Defendant.)		
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**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO THE COURT’S
NOVEMBER 11, 2009, MEMORANDUM OPINION & ORDER**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), the Central Intelligence Agency (“CIA” or “Defendant”), by and through undersigned counsel, respectfully requests that the Court extend the date by which Defendant must respond to the Court’s November 11, 2009, Memorandum Opinion and Order by seven (7) days, i.e., until and including August 23, 2010. Defendant also respectfully requests that the Court extend the time by which Plaintiff is required to oppose Defendant’s supplemental filing by seven (7) days as well. Pursuant to Local Civil Rule 7(m), on August 11, 2010, Assistant United States Attorney David Rybicki (“the Undersigned AUSA”) contacted Plaintiffs’ counsel, James Lesar, Esq., who graciously consented to the relief requested herein.

Good cause supports this motion. Since the Court issued the Case Management Plan for this action on February 17, 2010, Defendant has diligently worked to respond to the various orders contained in the November 11, 2009, Memorandum Opinion and Order. Specifically, Defendants have: drafted two extensive supplemental declarations from CIA officials explaining actions undertaken to respond to Plaintiffs’ FOIA requests; contacted referring and coordinating

agencies to ensure prompt processing of Plaintiffs' requests; and are currently producing an extensive, thousand-page Vaughn index related to Item 4 withholdings. Currently, however, the Vaughn index is not complete. Defendant estimates that it will be completed in a matter of days, and that Defendant will be able to respond fully to the Court's Memorandum Opinion and Order by August 23, 2010.

This request for extension of time is submitted in good faith and not for purposes of delay. A proposed order consistent with the relief requested herein is attached.

Dated: August 11, 2010

Respectfully submitted,

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