

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, Et al.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	C. A. No. 04-0814 HHK
	:	
CENTRAL INTELLIGENCE AGENCY,	:	
	:	
Defendant	:	

UNOPPOSED MOTION FOR ATWO-DAY EXTENSION OF
TIME WITHIN WHICH TO REPLY TO DEFENDANT'S
OPPOSITION TO PLAINTIFFS' MOTION FOR RECONSIDERATION

Come now plaintiffs Roger Hall and Studies Solutions Results, Inc. and move this Court for an extension of time, to and including July 23, 2008 within which to reply to defendant's opposition to their motion for reconsideration of plaintiff's motion for reconsideration of Magistrate Judge Facciola's order striking portions of the Declaration of Roger Hall. In support of this motion, plaintiffs represent to the Court as follows:

1. Plaintiffs' reply was due on July 21, 2008.
2. Several weeks ago, undersigned counsel decided to break a resolution he had made not to file any more FOIA suits until his number of such cases had reached down into single digits. He broke his resolution because of the potential importance of the case. He had not planned to file suit for another couple of weeks, early of the afternoon of Friday, July 18th, his client advised him that filing had become urgent because her arrangements with New York Times and CBS reporters for exclusives was clouded by another suit for the same records being filed on Monday, July 21st, or Tuesday, July 22nd.

Counsel dropped work on this case and another case and spent July 21st working on the new complaint. At the time he did so, he believed he would still be able to meet the July 21st deadlines in this and another case by working over the weekend.

3. Unfortunately, counsel was unable to accomplish much on Saturday because he had to spend more than five hours talking with internet service providers in order to get his email and internet capabilities restored. Because the other case counsel was working on had a dropdead deadline that had been imposed on both parties several months ago when that court ruled on the government's motion for an extension, counsel had to give that case priority over this one. He did manage to meet that deadline, albeit barely.

4. Counsel is now able to resume work on this case once again and believes there will be no need for any further extensions.

5. Defendant does not oppose this motion.

Respectfully submitted,

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Counsel for Plaintiffs Roger Hall
and SSRI, Inc.

July 22, 2008

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, Et al.,	:	
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Plaintiffs,	:	
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v.	:	C. A. No. 04-0814 HHK
	:	
CENTRAL INTELLIGENCE AGENCY,	:	
	:	
Defendant	:	

ORDER

Upon considerations of the unopposed motion of plaintiffs' Roger Hall and Studies Solutions Results, Inc. for an extension of time, and the entire record herein, it is by this Court this _____ day of July, 2008, hereby

ORDERED, nunc pro tunc that plaintiffs shall have until July 21, 2008 to file their reply to defendant's opposition to their motion for reconsideration.

UNITED STATES DISTRICT JUDGE