

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

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

PLAINTIFFS' MOTION FOR FURTHER EXTENSION OF TIME

Come now the plaintiffs, Roger Hall (“Hall”) and Studies Solutions Results, Inc., (“SSRI”), joined by plaintiff Accuracy in Media, Inc., (“AIM”) and move this Court for an extension of time, to and including December 17, 2008, within which to file their cross-motions for summary judgment and oppositions to defendant’s motion for summary judgment. As grounds for this motion, plaintiffs Hall and SSRI state the Court as follows.

1. Plaintiffs’ summary judgment motions are currently due December 9, 2008.
2. After successfully passing as EKG test on December 5th the undersigned counsel began to work virtually around the clock on plaintiffs Hall and SSRI’s cross-motion for summary judgment. By late afternoon on December 9th, it became apparent to him that he was going to need a one-day extension. He called counsel for defendant, who said she would not oppose it, but that she would be out of the country when her reply brief was due on January 9, 2009. Accordingly, she asked that he also request an extension of her time until January 19th for her reply, to which he agreed.

3. Around 7:00 p.m., counsel's client attempted to fax him a document.

Counsel's fax printed chewed it up. Afterwards, the printer would no longer work and counsel could find no way of fixing the problem, which involves the feed in jerking the sheet of paper violently to the left and jamming before it fully enters the machine. As a result, Counsel will try to get this problem fixed tomorrow. However, by that time he gets a fix or a "loaner," he leaves for New York City on a trip to meet with Nation Magazine's Victor Navasky and a client on December 11th and with another client on December 12th.

4. In light of these circumstances counsel needs a longer extension of time than originally anticipated. He can probably file the brief on Monday December 16th, but in light of the uncertainty over when he can get his fax printer fixed, he seeks an extension until December 17th.

5. Counsel is emailing this to counsel for Accuracy in Media who has agreed to file it for him. (As counsel can not print out any documents at present, he can scan them for filing with the Court.)

7. Counsel for Hall called counsel for defendant to report this new development but she had already left work. Thus, he does not now defendant's position on this motion.

8. The proposed order reflects defense counsel's earlier request for an extension of time to file her reply brief.

Respectfully submitted,

/s/

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ORDER

Upon consideration of plaintiff’s motion for a further extension of time, and the entire record, herein, it is by this Court this _____ day of December, 2008, hereby

ORDERED, that plaintiffs shall have until December 17, 2008, within which to file their cross-motion for summary judgment; and it is further

ORDERED, that defendant shall have until the 19thd day of January, 2009, to file its reply.

UNITED STATES DISTRICT COURT