

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	:	

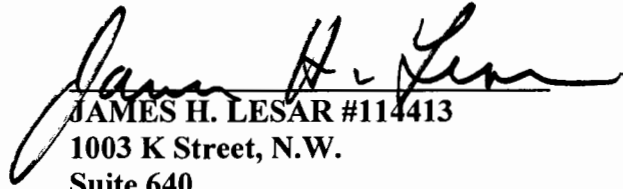
**RELY OF PLAINTIFFS ROGER HALL AND
STUDIES SOLUTIONS RESULTS, INC. TO DEFENDANT'S
OPPOSITOIN TO PLAINTIFFS' MOTION THAT COURT ORDER
DEFENDANTA TO FILE A STATUS REPORT INDICATING
STEPS TAKEN TO COMPLY WITH JANUARY 21, 2009
ORDER BY PRESIDENT BRAKA OBAMA ON OPENNESS**

In opposing the motion of plaintiffs Roger Hall and Studies Solutions Results, Inc. for an order requiring defendant Central Intelligence Agency ("CIA") to rile a status evaluating the impact of President Barak Obama's January 21, 2009 order establishing a new policy of openness in Freedom of Information Act matters, defendant takes the position that plaintiff has no right to demand, and it has no obligation to provide, such a status report. It rests its cases on the assertion that President Obama's openness memorandum "does not create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States>"

Plaintiffs have not argued that any such right or benefit was created. They do contend, however, that this Court has the power to require the CIA to explain

how and whether governmental policy is being implemented. In accordance with this, this Court should order the relief requested.

Respectfully submitted,



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AUGUST 19, 2009