

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	
ROGER HALL, <u>et al.</u> ,	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
v.	)	<b>Civil Action No. 04-00814 (HHK)</b>
	)	
CENTRAL INTELLIGENCE AGENCY,	)	
	)	
<b>Defendant.</b>	)	
_____	)	

**JOINT MOTION FOR EXTENSION OF TIME TO SUBMIT JOINT PROPOSED CASE  
MANAGEMENT PLAN & BRIEFING SCHEDULE TO GOVERN FURTHER  
PROCEEDINGS**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), plaintiffs Roger Hall, Studies Solutions Results, Inc., and Accuracy in Media, Inc. (“AIM”), and defendant the Central Intelligence Agency (“CIA”) (collectively, the “parties”) by and through undersigned counsel, respectfully request that this Court extend the date by which they must submit a joint proposed case management plan and briefing schedule to govern further proceedings until January 08, 2010. Pursuant to Local Civil Rule 7(m), Assistant United States Attorney David Rybicki (“the Undersigned AUSA”) contacted Plaintiffs’ counsels, who consent to the relief requested herein on December 28, 2009.

Good cause supports this motion. Plaintiffs submitted an unopposed motion for extension of time to file the parties’ joint case management plan and briefing schedule on December 18, 2009. Because the Court has not yet ruled on that motion, and because the extension of time requested therein has now expired, the parties respectfully seek the additional extension of time requested herein. 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.

Respectfully submitted,

/s/  
JOHN H. CLARKE, D.C. Bar #388599  
1717 K Street, N.W.  
Suite 600  
Washington, D.C. 20036

Attorney for Plaintiff Accuracy In Media, Inc.

/s/  
JAMES H. LESAR, D.C. Bar #114413  
1003 K Street, N.W.  
Suite 640  
Washington, D.C. 20001

Attorney for Plaintiffs Roger Hall & Studies  
Solutions Results, Inc.

/s/  
CHANNING D. PHILLIPS, D.C. Bar #415793  
Acting United States Attorney

/s/  
RUDOLPH CONTRERAS, D.C. Bar #434112  
Assistant United States Attorney

/s/ David C. Rybicki  
DAVID C. RYBICKI, D.C. Bar #976836  
Assistant United States Attorney  
Civil Division  
555 4th Street, N.W.  
Washington, D.C. 20530  
Tel: (202) 353-4024  
Fax: (202) 514-8780

Attorneys for Defendant Central Intelligence  
Agency