

**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	:	

**UNOPPOSED MOTION FOR FURTHER EXENTION OF TIME
TO FILE RESPONSE TO CIA’S SUPPLEMENTAL MEMORANDUM**

Come now the plaintiffs, Roger Hall and Studies Solutions Results, Inc., (hereafter collectively referred to as “Hall”), and move this Court for an extension of time, to and including March 16, 2011, to respond to the CIA’s Supplemental Memorandum in Response to this Court’s Memorandum Opinion and Order of November 12, 2009. As grounds for this motion, Hall represents to the Court as follows:

- 1. Hall’s response is presently due on or before December 14, 2010.**
- 2. Defendant does not oppose this motion. Plaintiff Accuracy in Media joins in this motion.**
- 3. Defendant Central Intelligence Agency has another possible release of records scheduled to be made on or before January 31, 2010. It does does not make sense in terms of judicial economy and the avoidance of piecemeal litigation to brief new issues arising out of any disclosures made, or positions taken, on January 31, 2011, until that has occurred.**

4. Additionally, there are problems which make it impossible to meet the file plaintiffs' responses any time soon. Plaintiff currently has another brief also due on December 14, 2010, in Lardner v. F.B.I., Civil Action No. 03-0874, with no further extensions permitted. He currently has another brief due in the Court of Appeals in Morley v. Central Intelligence Agency, D.C.Cir. No. 10-5161, and although the parties have agreed to move for a stay in the briefing of that case while they attempt to negotiate a settlement, the mediation process will require a substantial amount of work over the next several weeks, if past experience is any guide. On December 20, 2010, plaintiff's counsel is due to receive the Government's brief in another case, Blackwell v. F.B.I., et al., D.C. Cir No. 10-5072, which makes his reply brief in that case due around January 5, 2011. Because a trip out-of-town during the Christmas-New Year's holidays, he will probably be seeking a short delay in the filing of that brief, until around January 10, 2011.

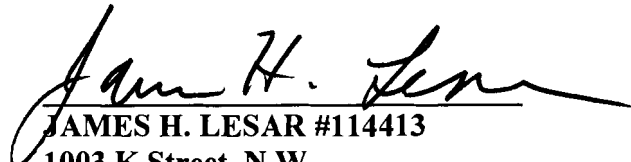
5. Plaintiff's counsel lost about two weeks out of his schedule before the Thanksgiving holidays because of incessant computer virus attacks. Plaintiff's counsel has placed his daughter, who is much more knowledgeable than he about computer matters, in charge of purchasing and installing a new computer. While this project was interrupted during the Thanksgiving holidays, it is now underway again and should come to fruition shortly. In the meantime, while his daughter was successful in abating the computer virus problems, they still surface on occasion. Last week he had to summon his daughter's emergency system when it developed that his computer was under attack by 19 viruses.

6. Plaintiff's counsel has multiple potentially serious health problems,

including insulin-dependent Type II diabetes, greatly impaired eyesight, high blood pressure (although with medication it is running at about 110-120 over 60 at present), and the early stage of kidney disease. Given these conditions and his very heavy work schedule he must, at age 70, be careful to avoid overstressing himself if possible. Counsel's attempts to abate the stress he is under and wind down his FOIA practice have been delayed greatly by numerous delays on the part of government agencies in several of his cases over the past several months, and by the receipt of tens of thousands of pages of new documentary releases in these cases.

7. Matters are further complicated by the fact that months ago counsel agreed to accompany his wife on a trip to Singapore, where her family resides, Counsel will leave for that trip on February 16, 2011, and return on March 1, 2011.

Respectfully submitted,



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Counsel for Plaintiffs
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Dated: November 13, 2010

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CENTRAL INTELLIGENCE AGENCY	:	
	:	
Defendant	:	

ORDER

Upon consideration of plaintiffs' opposed motion, and the entire record hereing, it is by this Court this _____ day of December, 2010, hereby

ORDERED, that plaintiffs shall file their response to defendant CIA's supplemental memorandum in response to this Court's order of November 12, 2010, on or before March 16, 2011.

**_____
UNITED STATES DISTRICT COURT**