

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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

CORRECTED UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE OPPOSITION TO CIA’S SUPPLEMENTAL ITEMS  
4 AND 5 RESPONSE TO COURT’S NOVEMBER 12, 2009 ORDER

Come now the plaintiffs, Roger Hall and Studies Solutions Results, Inc., (hereafter collectively referred to as “Hall”), and Accuracy in Media, and move this Court for an extension of time, to and including June 20, 2012, to respond to the CIA’s Supplemental Items 4 and 5 Response to the Court’s November 12, 2009 Order. As grounds for this motion, plaintiffs state to the Court as follows:

1. Plaintiffs’ response is due June 15, 2012, At a status conference on April 20, 2012, the Court directed defendant to file its supplemental motion for summary judgment by May 15, 2012, and gave plaintiffs until

June 15, 2012 to file their opposition. From the bench the Court indicated that no further extensions would be granted.

2. Extenuating circumstances impel plaintiff Hall to seek a three working-day extension, to June 20, 2012. Last June Hall suffered a stroke which left the left side of his body impaired. The use of his left arm and hand is severely limited. Using a cane, he is able to walk only a very short distance. Because of these handicaps, it is extremely difficult for him to manipulate papers, particularly large volumes of papers.

3. In early February 2012, the undersigned counsel received a large bundle of newly released documents from the National Security Agency (NSA). He immediately took the bundle to Mr. Hall's apartment and Mr. Hall took the papers to the ABC Imaging Company in Silver Spring to have a duplicate copy made for the undersigned counsel. However, ABC Imaging botched the copying job and lost approximately half of the records. Because of this incident and trouble handling paper copies, Hall asked that NSA provide these records to him again but in digital, word-searchable format. On a couple of occasions over the past three months or so, NSA has said that it would do so. The last such occasion came last Wednesday, June 6<sup>th</sup>, when the undersigned counsel and Hall were advised telephonically by NSA