

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

ROGER HALL, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No.: 04-0814 (RCL)
	)	ECF
CENTRAL INTELLIGENCE AGENCY,	)	
	)	
Defendant.	)	
_____	)	

**CONSENT MOTION FOR A TWO-DAY EXTENSION OF TIME**

Defendant, through and by undersigned counsel, hereby submits this Motion for Extension of Time to respond to Plaintiffs’ filings of June 20, 2012, and in opposition to Plaintiffs’ requests therein for *in camera* review and for discovery – in this Freedom of Information Act matter – (collectively “plaintiffs’ filings”), including and until Tuesday, July 10, 2012. Good cause exists to grant this motion.

1. Pursuant to the Court’s minute order of June 14, 2012, Defendant’s responses to Plaintiffs’ filings are due on Friday, July 6, 2012.<sup>1</sup>
2. Although the drafting of CIA’s responses are well under way, the agency requests two additional business days to complete and submit its responses to Plaintiffs’ voluminous filings, due to the need to further coordinate with agency counsel, who has been recently unavailable. Additionally, undesignated counsel experienced a brief illness during the past two days. Further, she is engaged in discovery in an employment discrimination matter, which includes, *inter alia*,

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<sup>1</sup> In light of the Court’s admonition during the April 20, 2012 status conference, undersigned counsel regrets the need to make the present request. However, the circumstances giving rise to this situation were beyond her control, and it has become apparent that Defendant will be unable to meet the current due date.

taking and defending five depositions during the next four business days, while she manages her other cases and investigations.

3. Pursuant to Local Rule 7(m), the parties have conferred and both AIM's attorney, Mr. Clarke, and Mr. Hall's attorney, Mr. Lesar, consent to the relief requested.

4. The parties will not suffer any prejudice if this motion is granted.

5. Defendant therefore requests two additional business days to file its responses.

WHEREFORE, Defendant requests that this enlargement be granted, and that the date for the filing of its responses to Plaintiff's filings be extended to July 10, 2012. A minute order is requested.

Respectfully submitted,

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Dated: June 6, 2012.  
Washington, D.C.