

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	:	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO
REPLY TO DEFENDANT’S OPPOSITION TO
PLAINTIFF’S MOTION FOR PARTIAL SUMMARY JUDGMENT

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 August 16, 2013 to respond to the defendant Central Intelligence Agency’s opposition to plaintiff’s motion for summary judgment on the issue of whether the CIA must provide records to Hall in word searchable pdf format.

As grounds for this motion, Hall represents to the Court as follows:

1. Defendant Central Intelligence Agency (CIA”) filed its opposition to Hall’s motion for partial summary judgment on July 29, 2013. Hall’s reply is due on or about August 8, 2013.

3. Upon review of the CIA’s motion and the Declaration of Martha Lutz submitted in support thereof, Hall finds it necessary to engage a computer expert who can file an affidavit countering the representations made by Lutz. This will require additional time.

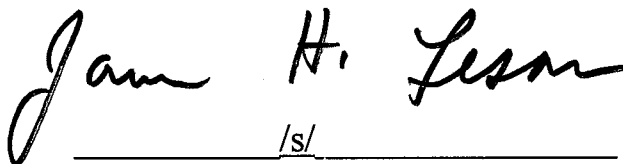
4. Additionally, Hall’s counsel is confronted with the need to file reply briefs in two other cases next week which will require a great deal of work to be done of them this week. He currently has a reply brief due in Clemente v. F.B.I., Civil Action No. 08-1252, on August 8, 2013.

Yesterday he filed a motion to extend the time to file his reply in that case to August 14, 2013. In a second case brought by Clemente, Clemente v. F.B.I., Civil Action No. 13-0108, he has a reply brief due on August 12, 2013. At a status hearing held on July 30, 2013, before Judge Thomas F. Hogan, in the latter case, Judge Hogan, having been made aware that Ms. Clemente is terminally ill with cancer, expedited Clemente’s motion to set a schedule requiring the release of at least 5,000 pages per month of the approximately 55,000 pages of records at issue. He ordered the FBI to respond to her motion, filed on July 30th, by August 6, 2013, and he gave Clemente until

August 12, 2013 to respond. This evening, August 6th, the FBI has filed a lengthy motion to stay proceedings which will require a great deal of work to respond to before the August 12th due date. Both Ms. Clemente's health and the fact that national attention is now being focused on the issues raised by Clemente's work on the joint corruption of FBI officials and its Top Echelon informants, an issue now before the Justice Department's Office of the Inspector General, priority must be given to expediting this case.

5. Defendant has advised plaintiff's counsel that it does not oppose this motion

Respectfully submitted,



/s/
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Counsel for Plaintiffs
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Dated: August 7, 2013

/s/
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Counsel for Plaintiff AIM, Inc.

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CENTRAL INTELLIGENCE	:	
AGENCY	:	
	:	
Defendant	:	

ORDER

Upon consideration of plaintiffs' unopposed motion for an extension of time to reply to defendants' opposition to plaintiffs' motion for partial summary judgment, and the entire record herein, it is by this Court this _____ day of August, 2013, hereby

ORDERED, that plaintiffs shall file their reply to defendant's opposition to their motion for partial summary judgment on or before August 16, 2013.

UNITED STATES DISTRICT COURT