

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	:	

PLAINTIFF’S RESPONSE TO DEFENDANT
CENTRAL INTELLIGENCE AGENCY’S STATUS REPORT

On February 11, 2014, defendant Central Intelligence Agency (CIA) filed a status report which stated that the CIA’s “motion” for a representative sample Vaughn index “is now deemed conceded.” However, plaintiffs Roger Hall and Studies Solutions Results, Inc., only consented to the motion for extension of time, not to the suggestion that only a partial Vaughn index need be done.

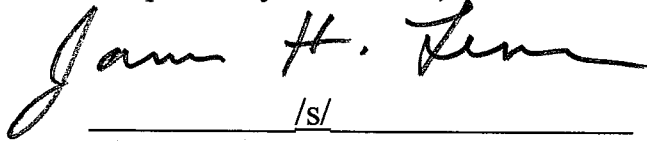
Plaintiffs have now reconsidered their position. All (or nearly all) of the documents at issue have now been produced. Examination of them has made clear that while a complete inventory of responsive records is needed, a complete Vaughn index describing and justifying each redaction is not.

Plaintiffs have conferred with counsel for the CIA and proposed a complete inventory of the documents plus a representative sample of some of them.

The CIA is currently considering this proposal.

The undersigned counsel has consulted John Clarke, counsel for plaintiff Accuracy in Media, Inc., and his client has agreed to participate in these negotiations.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "James H. Lesar".

/s/

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Counsel for Plaintiffs
Roger Hall and SSR, Inc.

Dated: February 18, 2014