

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

ROGER HALL, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 04-814 (RCL)
)	ECF
CENTRAL INTELLIGENCE AGENCY,)	
)	
Defendant.)	
_____)	

PROPOSED BRIEFING SCHEDULE

Pursuant to the Court’s order of September 29, 2014, the parties respectfully submit the following dispositive motions briefing schedule:

On or before October 15, 2014, plaintiffs Roger Hall (“Hall”) and Studies Solutions Results, Inc. will submit a list of the 100 documents selected for inclusion in the sample *Vaughn* index.

On or before November 3, 2014, the parties will determine whether they are able to amicably resolve Plaintiffs’ demand for an interim award of attorney fees and costs.

Plaintiffs’ Proposal

On or before December 3, 2014, Plaintiffs will move for any award of attorneys’ fees and costs, if the parties’ negotiations are unsuccessful.

On or before December 5, 2014, Defendant Central Intelligence Agency will file its dispositive motion.

On or before December 18, 2014, plaintiffs will file a motion to stay proceedings pending resolution of any motion for interim fees that has been filed. If the fees issue has not been resolved by December 18, 2014, a motion to stay proceedings will be necessary because

of the dire financial circumstances of the counsel representing Roger Hall and Studies Solutions Results, Inc.

Defendant's Proposal

On or before December 5, 2014, Defendant Central Intelligence Agency will file its dispositive motion.

On or before February 2, 2015, Plaintiffs will file their response to Defendant's dispositive motion, and cross motions, if any.

On or before March 4, 2015, Defendant will file its reply in support of its dispositive motion and opposition to a cross motion, if any.

On or before March 24, 2015, Plaintiffs will file their reply.

The parties request a minute order.

Respectfully submitted,

/s/

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Dated: September 30, 2014