

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 04-814 (RCL)
)	
CENTRAL INTELLIGENCE AGENCY,)	
)	
Defendant.)	
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**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION
OF TIME WITHIN WHICH TO REPLY TO
DEFENDANT'S OPPOSITION TO MOTION FOR
INTERIM AWARD OF ATTORNEY'S FEES AND COSTS**

Plaintiffs Roger Hall and Studies Solutions Results, Inc. ("Hall"), joined by Accuracy in Media ("AIM"), move for an extension of time, to and including March 17, 2015, within which to file their replies to the opposition of defendant Central Intelligence Agency ("CIA") to plaintiffs' motions for interim awards of attorneys' fees and costs. Defendant does not oppose this motion. As grounds therefore, plaintiffs represent to the Court:

1. As a result of a previous motion for extension of time by the CIA, the CIA filed its opposition to plaintiffs' motion on February 27, 2015. That motion, not yet acted upon by this Court, commensurately extended the time for plaintiffs to file their replies to and including March 12, 2015.

2. Plaintiff Hall's counsel, James H. Lesar, was diagnosed as having a blood clot in his right calf on October 1, 2015. This and other physical disabilities he suffers from—diabetes, kidney disease, and high blood pressure—limit the pace at which he can now work. On occasions, fatigue and body pains—legs, hips, shoulders, lower back, etc.

make it impossible for him to work productively on a given day or substantial portions thereof. This has happened on three days since the CIA filed its opposition.

3. In addition, he has had to do some work on other cases during this period.

4. Also, due to the press of other cases pursued by AIM's counsel, John H.

Clarke, the plaintiffs are unable to devote sufficient resources in the time allotted to counter the arguments advanced by the CIA, including that:

- The greater part of the services performed were undertaken in support of issues on which the CIA's legal position remained unchanged, and were otherwise unrelated to issues on which plaintiffs did prevail;
- Plaintiffs have made no effort to segregate time spent on unsuccessful claims;
- Plaintiffs' billing rates are unjustified;
- The use of two counsel resulted in duplication of efforts;
- The use of two counsel resulted in unnecessary time spent communicating with one another;
- The amount claimed is largely due to the length of the litigation, and this circumstance was largely caused by plaintiffs;
- The CIA's positions were reasonable;
- The litigation did not advance the public interest;
- The litigation was unnecessary because government-initiated programs had already released the information sought before suit was filed; and
- Plaintiff AIM is not interested in the records, but, rather, was brought aboard simply to gain access to the FOIA's fee waiver provision.

WHEREFORE, Plaintiffs Roger Hall, Studies Solutions Results, Inc., and Accuracy in Media respectfully move for an extension of time, to and including March 17, 2015, within which to file their replies to the opposition of defendant Central Intelligence Agency to plaintiffs' motions for interim awards of attorneys' fees and costs.

Date: March 9, 2015.

Respectfully submitted,

/ s/

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/ s/

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_____)	

ORDER

Upon consideration of plaintiffs' unopposed motion for an extension of time, and the entire record herein, it is by this Court this _____ day of March 2015, hereby

ORDERED, that plaintiff shall have until March 17, 2015 to file their reply to defendant's opposition to plaintiffs' motion for interim award of Attorneys' fees.

UNITED STATES DISTRICT JUDGE