

**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.)	
_____)	

**CONSENT MOTION TO ENLARGE TIME TO FILE DEFENDANT’S
MOTION FOR SUMMARY JUDGMENT**

Defendant, the Central Intelligence Agency (CIA), respectfully moves the Court for a moderate enlargement of time to its motion for summary judgment. Defendant request a 20-day extension, through and including July 13, 2016. In support of its motion, defendant states as follows.

1. CIA’s motion for summary judgment is currently due on June 23, 2016. Its declaration is largely complete; this extension is due to massive conflicts in undersigned counsel’s schedule.
2. Since the beginning of June, undersigned counsel has been responsible for drafting four substantial filings in other matters. These include: (i) and (ii) two motions for summary judgment in *Pinson v. DOJ*, No. 12-1872 (CRC) (filed June 1 and June 10); (ii) defendant’s Findings of Fact and Conclusions of Law in *SD3 v. Lee*, No. 08-1242 (RCL) (filed June 13); and (iii) defendant’s motion for summary judgment in *Hicklin v. McDonald*, No. 14-1569 (CRC) (filed June 15).

3. On June 23, the day the CIA's motion is due in this case, undersigned counsel also has a summary judgment motion due *Smith v. Contreras-Sweet*, No. 15-472 (CRC), a complex Title VII matter.
4. Complicating matters yet further, Magistrate Judge Kay recently selected June 22 – *i.e.*, the day before the summary judgment motions are due – for mediation in *Gaskins v. United States*, No. 14-1208 (APM). This was not a date selected in advance by the parties.
5. Although only a brief enlargement beyond June 23 would be necessary, undersigned counsel will be out of the country from June 24 through July 6. The requested enlargement extends only a week past July 6.
6. Plaintiffs' counsel has consented to the requested relief.

For the foregoing reasons, defendant respectfully requests a 20-day enlargement of time, through and including July 13, to file its motion for summary judgment. A proposed order is attached that extends the opposition and reply deadlines by equal periods.

Dated: June 16, 2016

Respectfully submitted,

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United States Attorney

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By: /s/ Damon W. Taaffe
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Order

UPON CONSIDERATION of the defendant’s consent motion for an extension of time to file its motion for summary judgment, it is hereby ORDERED that the motion is GRANTED. Defendant shall file its motion for summary judgment by July 13, 2016; plaintiffs shall file their opposition by August 18, 2016; and defendant shall file its reply by September 6, 2016.

SO ORDERED.

Date

Royce C. Lamberth
United States District Judge