

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.	)	
_____	)	

PLAINTIFFS' UNOPPOSED MOTION FOR ENLARGEMENT OF TIME  
TO FILE REPLIES IN RESPONSE TO DEFENDANT'S OPPOSITION  
TO PLAINTIFFS' CROSS-MOTIONS FOR SUMMARY JUDGMENT

COME NOW plaintiffs Roger Hall, Studies Solutions Results, Inc., and Accuracy in Media, Inc., by counsel, under Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, and respectfully move this Court for an enlargement of time to file their Replies to defendant CIA's Opposition to plaintiffs' cross-motions for Summary Judgment. Defendant CIA consents to this relief.

Memorandum of Points and Authorities

1. By Order entered on February 16, 2016 (Docket No. 274), the Court granted the Plaintiffs' Motion to enlarge the time to submit their memoranda in reply to defendant's oppositions to plaintiffs' dispositive motions, to February 27, 2017.

2. On February 20, 2017, Hall's counsel, James H. Lesar, was transported to Holy Cross Hospital in Silver Spring, MD for emergency medical treatment. This was the result of circumstances which developed on the evening of February 19, when he began to suffer uncontrollable chills, and excruciating pain, all over his body, but particularly in his right ankle, calf, and thigh. By late Saturday morning he was in a greatly weakened

condition and unable to walk without assistance. This led his wife to summon an ambulance. Mr. Lesar remained in Holy Cross Hospital for the rest of the week. He was hooked up to multiple IV's in both arms and continued to suffer bouts of extreme pain. He was discharged on Friday evening, February 24, 2017. While he was greatly improved upon discharge, his illness or possible illnesses are not entirely resolved, and a relapse is still possible. He will now resume work on this case, but must proceed cautiously. For these reasons he seeks a continuance to and including March 14, 2017 to file his clients' reply brief.

3. Under Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, *Extending Time*, "the court may, for good cause, extend the time... if a request is made, before the original time or its extension expires..."

4. Given Mr. Lesar's medical condition, he will need an additional 14 day extension of time beyond the due date of February 27, to March 14, 2017

WHEREFORE, plaintiffs respectfully seek an extension of time to and including March 14, 2017, to submit their Reply Memoranda to defendant's oppositions to plaintiffs' cross-motions for summary judgment.

DATE: February 27, 2017.

Respectfully submitted,

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/s/  
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_____	)	

ORDER

Upon consideration of the plaintiffs' motion for enlargement of time to file their reply memoranda to defendant's opposition to plaintiffs' motions for summary judgment, and defendant's consent thereto, it is hereby

ORDERED that plaintiffs shall have until March 14, 2017, to submit their Reply Memoranda to Defendant's Opposition to Plaintiffs' Cross-motions for Summary Judgment.

Dated: \_\_\_\_\_, 2017.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE