

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, Et al., :  
 :  
 Plaintiffs, :  
 :  
 v. : C. A. No. 04-0814 HHK/JMF  
 :  
 CENTRAL INTELLIGENCE AGENCY, :  
 :  
 Defendant :

PLAINTIFFS' MOTION FOR LEAVE TO FILE RESPONSE TO  
DEFENDANT'S REPLY TO PLAINTIFFS' OPPOSITION  
TO DEFENDANT'S MOTION FOR A PROTECTIVE ORDER

Come now plaintiffs Roger Hall and Studies Solutions Results, Inc. and move this Court leave to file the attached response to defendant's reply to plaintiffs' opposition to Defendant's motion for a protective order. As grounds for this motion, plaintiffs state to the Court as follows.

1. On December 28, 2006, defendant filed its reply to plaintiffs' opposition to its *Motion for a Protective Order*. On or about December 23, 2006, plaintiff's counsel began to suffer a series of breakdowns in computers, a printer, and a scanner. As a result, when he left December 29, 2006 on a New Year's trip, he was unaware that defendant had filed its reply on December 28<sup>th</sup> as scheduled.

2. Counsel returned to work from his New Year's trip on January 3, 2007, Facing a situation in which his old reliable 1989 NEC Computer with its WordPerfect 5.1 program would be available to him shortly. This did not happen. He also hoped that the Fujitsu 15C scanner connected to his Dell Windows 96 computer would become

operational again. He thought this would happen after Computer Geeks came to his office, but after multiple visits he ended up having to switch to a newer computer and newer scanner, to transfer 32 gigabytes of material from his old Windows 98 computer to newer computer, and to begin to learn to use Microsoft Word, which he found frustrating.

3. In short, most of counsel's time since he returned from vacation has been spent trying to get computer problems fixed or learning a new word processing system.

4. Defendant's reply asserts that plaintiffs misrepresented facts to the Court in Their opposition to its motion for a protective order. This is not true and requires Correction, which is the principal focus of plaintiffs' response.

5. Counsel for defendants advised that defendants would take no position on this motion.

Respectfully submitted,

/s/

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Dated: January 16, 2007