

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al. :
 :
 Plaintiffs :
 :
 v. : C. A. No. 04-0814 (HHK)\
 :
 CENTRAIL INTELLIGENCE AGENCY :
 :
 Defendants :

UNOPPOSED MOTION OF PLAINTIFFS ROGER HALL AND STUDIES
SOLUTIONS RESULTS, INC. FOR EXTENSION OF TIME TO FILE
MOTIN FOR RECONSIDERATION OF MAGISTRATE FACCIOLA'S RULING

Come now plaintiffs Roger Hall and Studies Solutions Results, Inc. ("SSRI"), and moves this Court for an extension of time, to and including May 14, 2008, within which to move for reconsideration of Magistrate Facciola's March 10, 2008 ruling on defendant's motion to strike. As grounds for this motion, plaintiffs represent to the Court as follows:

1. Plaintiffs' motion for reconsideration is currently due Marach 31, 2008.
2. In working on the motion for reconsideration over the past few days it became apparent that much more time is needed that was previously estimated. This is because a careful and detailed review of a couple of thousand pages of materials will be necessary in order to revise the declaration of Roger Hall and properly support the motion for reconsideration. This task will also be complicated by other time-consuming factors,

such as the need to secure more legible copies or records and to locate missing pages.

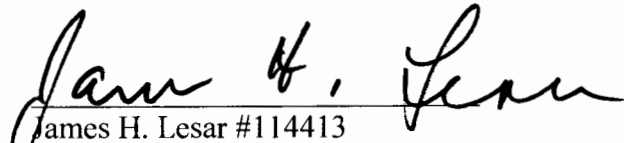
There will also be a need to re-scan some materials.

3. Additionally, plaintiffs' counsel, despite efforts to greatly his litigation case load in anticipation of semi-retirement, finds himself still confronted by a busy litigation schedule. He presently has a drop-dead deadline of April 7, 2008, for submission of a brief in Schoenman v. Federal Bureau of Investigation, et al. Civill Action No. 04-2202, which he has not yet begun writing. After that brief is filed, he will be able to work on this case for the next two weeks before leaving on a trip to Columbia, Missouri from April 24-27. After that, he must begin working on a brief due in the Court of Appeals on May 5, 2008, in the case of Davy v. Central Intelligence Agency, D.C. Cir. No. 07-5200.

4. As he approaches his 68th birthday this May 23rd, counsel also finds himself spending increasing amounts of his time on medical tests and appointments, and several of these are schedule over the next three weeks. Moreover, due to underlying visual problems which are the result of extensive laser surgery on his eyes as a consequence of diabetic retinopathy, counsel's work pace will be slower than normal despite recent successful cataract surgery on both eyes.

5. Defendant does not oppose this motion.

Respectfully submitted,


James H. Lesar #114413
1003 K Street, N.W.
Washington, D.C. 20001

3

Phone: (203) 393-1921

Counsel for Plaintiffs

March 31, 2008
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al.	:	
	:	
Plaintiffs	:	
	:	
v.	:	C. A. No. 04-0814 (HHK)\
	:	
CENTRAIL INTELLIGENCE AGENCY	:	
	:	
Defendants	:	

ORDER

Upon consideration of Plaintiffs' unopposed motion for an extension of time, and the entire record, it is by this Court this _____ day of April, 2008, hereby

ORDERED, that plaintiffs shall file their motion for reconsideration on or before May 14, 2008.

UNITED STATES DISTRICT COURT