

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

STEVEN AFTERGOOD,)
)
 Plaintiff,)
)
 v.) Civil Action No. 01-2524 (RMU)
)
 CENTRAL INTELLIGENCE AGENCY,)
)
 Defendant.)
 _____)

UNOPPOSED MOTION FOR ENLARGEMENT OF TIME

Defendant, by its undersigned attorneys, respectfully moves the Court, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, for an order granting an enlargement of time in which to file its opposition to plaintiff's Motion to Strike the Declaration of John E. McLaughlin (which plaintiff filed on September 22, 2004) [hereinafter "Motion to Strike"] and its reply to plaintiff's "Reply to Defendant's Opposition and Plaintiff's Response to Defendant's Cross-Motion for Summary Judgment" (which plaintiff filed on September 27, 2004) [hereinafter "Response"]. The Court granted defendant's only previous enlargement motion, which was filed for the purpose of obtaining an enlargement of the amount of time in which defendant was to have filed its dispositive motion. Plaintiff has been consulted and has authorized defendant's principal counsel to represent that plaintiff does not oppose this motion.

By operation of Local Civil Rule 7(b) in conjunction with Federal Rule of Civil Procedure 6, defendant is due to file its

opposition to plaintiff's Motion to Strike by October 6 -- which, in accordance with the Court's Order of August 20, 2004, is the same date by which defendant must file its reply brief in further support of its cross-motion for summary judgment. For the reasons discussed below, defendant respectfully suggests that the enlargement of this deadline would promote the full and efficient adjudication of the important issues involved in this litigation.

In his Motion to Strike and in his Response, plaintiff has presented no fewer than eight separate claims that purportedly refute assertions and arguments presented in papers that defendant has filed in support of its Cross-Motion for Summary Judgment and in opposition to plaintiff's Motion for Summary Judgment. After carefully reviewing all of plaintiff's claims, defendant has determined that it will be necessary to submit additional declarations in order to fully and properly address each of those claims. Due to the number and apparent complexity of plaintiff's claims, additional time is needed for this purpose.

Accordingly, defendant respectfully requests that the October 6 deadline for the filing of its opposition to plaintiff's Motion to Strike and its reply to plaintiff's Response be enlarged by fourteen calendar days, to and including October 20, 2004. Defendant respectfully suggests that the requested enlargement of time will allow it a full opportunity to

clarify all of the issues that now are before the Court and will not materially delay this action.

Respectfully submitted,

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