

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

NATIONAL SECURITY COUNSELORS, *

*

Plaintiff, *

*

v. *

Case: 1:11-cv-00443 (BAH)

*

CENTRAL INTELLIGENCE AGENCY, *

*

Defendant. *

*

* * * * *

PLAINTIFF’S MOTION FOR LEAVE TO SUBMIT A DEMONSTRATIVE EXHIBIT

NOW COMES Plaintiff National Security Counselors (“NSC”) to respectfully request the leave of the Court to submit a demonstrative exhibit, attached as Ex. R. Plaintiff’s Opposition to Defendant’s Motion to Dismiss Claims One and Two of Plaintiff’s Complaint (filed June 16, 2011) contains a detailed summary of the overlapping timelines of four separate FOIA requests and the *Feinman v. FBI* litigation. (*See id.* at 14-19.) Because the relationships between these multiple timelines are occasionally difficult to see in the prose form in which they were originally presented in NSC’s Opposition, NSC created a color-coded graphic chart that more clearly illustrates the respective timelines and how they relate to one another. No new information is added in this exhibit; it is purely a demonstrative exhibit for the Court’s benefit.

Defendant opposes this Motion. A proposed Order also accompanies this Motion.

Date: July 5, 2011

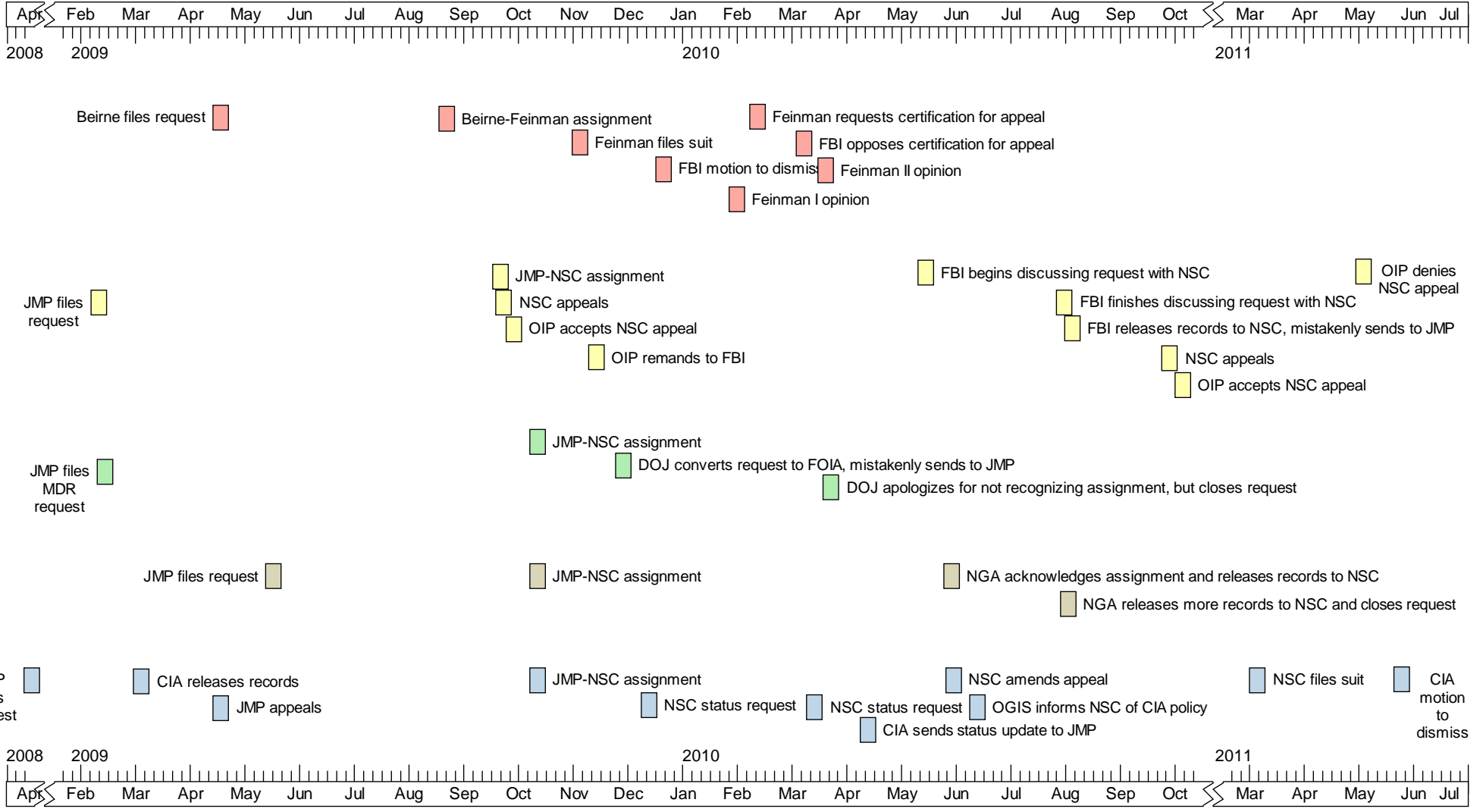
Respectfully submitted,

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Counsel for Plaintiff

EXHIBIT R

Request timelines



Legend:	■ Feinman	■ JMP-NSC CIA Req F-2008-01105	■ JMP-NSC FBI Req 1126251-000
	■ JMP-NSC DOJ Req 09-R0360	■ JMP-NSC NGA Req 20080045F	