

The proposed new complaint also is attached as Exhibit 1 and the “red line” tracked changes version as Exhibit 2. A Memorandum in Support of Plaintiffs’ Motion and Proposed Order are attached.

Plaintiffs met and conferred by telephone on July 3, 2014. Defendant Federal Election Commission has not consented to this motion.

The parties agree that no hearing or oral argument is required on this motion.

Dated this 7th day of July 2014.

Respectfully submitted,

/s/ Michael T. Morley
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Dan Backer, hereby certify that on this 7th day of July 2014, I did cause a true and complete copy of the foregoing Motion of Plaintiffs Stop Reckless Economic Insecurity Caused by Democrats, Tea Party Leadership Fund, and Alexandria Republican City Committee to Amend and/or Supplement Complaint Pursuant to Fed. R. Civ. P. 15(a) and/or (d); the exhibits thereto, supporting memorandum, and proposed order to be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following counsel for the plaintiff:

Kevin Deeley
Harry J. Summers
Holly J. Baker
Kevin P. Hancock
Esther D. Gyory
FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

/s/ Dan Backer
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Attorney for Plaintiffs