

LAW OFFICES OF ANDREW P. PUGNO

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Via Facsimile only: (202) 219-3923

April 19, 2006

Ms. Kim Collins
Complaints Examination and Legal Administration
Federal Election Commission
999 E St NW
Washington DC 20463-0001

Re: MURs 5725 and 5727
Request for Extension of Time

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
2006 APR 20 A 9:08

Dear Ms. Collins:

The undersigned represents V. Eric Roach, the Eric Roach for Congress campaign, and its treasurer, David Bauer. Enclosed please find the Statement of Designation of Counsel executed by Mr. Bauer in connection with both MUR 5725 and MUR 5727. Please direct all future communications regarding these matters to my attention.

I am requesting an extension of time to prepare responses for both matters. We received MUR 5725 and MUR 5727 on April 14 and April 17, respectively. Responses are currently due by May 1¹ and May 2, 2006, respectively.

I request a combined extension of thirty (30) days following May 2 so that responses to both matters would be due filed on or before June 1, 2006. Good cause exists for this extension as follows:

1. I will be unable to work on the responses for several days because I am leaving town tomorrow to present an academic paper at a pre-scheduled conference.
2. I will be unable to reach the candidate until next week, as he is currently on a family vacation and unavailable.
3. I will have difficulty preparing adequate responses within the time normally allowed, having received two complaints on distinct matters at roughly the same time with adjacent due-dates for responses.
4. I will be out of town for a pre-planned camping trip beginning Friday, April 28.

¹ April 29 falls on a Saturday We assume the response is due the next business day.

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- 5. I will be out of town Friday and Saturday, May 12 and 13, attending all-day continuing legal education classes in San Francisco, California.
- 6. I also need the additional time in order to investigate the two complaints, including interviewing and reviewing the records of multiple vendors and contractors who were engaged by the Campaign to prepare the communications challenged by these two complaints.

Based on the above-described obstacles, it would be extremely difficult for me to prepare complete responses to both matters – especially at the same time – within the time normally allowed. An extension to June 1, 2006, would be appreciated. Please let me know at your earliest convenience whether the extension is granted.

Thank you for your attention. I can be reached via telephone at (916) 608-3065, via facsimile at (916) 608-3066, or via email at andrew@pugnolaw.com.

Very truly yours,

Andrew P. Pugno
 ANDREW P. PUGNO
 Attorney at Law

cc: Client

Attachment: Statement of Designation of Counsel

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