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November 19, 1997

Jennifer H. Boyt, Esq.
Office of General Counsel
Federal Election Commission
Office of General Counsel
999 "E" Street, N.W.
Washington D.C. 20463

RE: MUR 4687: Statement of Designation of Counsel
Request for Extension of Time to File Response

Dear Ms. Boyt:

We write on behalf of our clients, Keep Ohio Working, an Ohio-registered political action committee against which a complaint has been filed before the Federal Election Commission ("Commission"). The Commission has numbered this matter MUR 4687 as referenced above. We submit the enclosed Statement of Designation of Counsel on behalf of Roger R. Geiger, Treasurer, Keep Ohio Working.

Monday, November 17, 1997, we received from our client a letter from F. Andrew Turley, Supervisory Attorney, Central Enforcement Docket. The letter provided notice of a complaint filed before the Commission by the Democratic Senatorial Campaign Committee. Also included was a copy of the complaint. The letter was dated November 5, 1997. The envelope in which it was received was post-marked November 7, 1997, and we believe our clients received this letter and complaint sometime after the November 11th Veterans' Day holiday. We understand that we have fifteen (15) days, plus three (3) days for service by mail, from the date of receipt in which to submit a response to this complaint.

BRICKER & ECKLER LLP

Jennifer H. Boyt
Office of General Counsel
Federal Election Commission
November 19, 1997

We respectfully request an extension of this time period. The reason for this request is two-fold. First, several important Keep Ohio Working officers and staff have been out of the office recently and some will not be returning for seven (7) to ten (10) days. In addition, several persons will be out of the office next week to celebrate the Thanksgiving holiday. These absences impede our ability to review and evaluate MUR 4687. Second, an extension of time is necessary in order for us to adequately prepare a response to MUR 4687. Such a response would require interviewing and obtaining statements under oath from Keep Ohio Working officers and staff persons as well as co-party Ohio Governor George Voinovich. Research of Commission advisory opinions and federal case law would also be required.

Believing the aforementioned reasons constitute good cause, we respectfully request an extension of an additional twenty (20) days from November 29th, thereby requiring that we submit a response to your office by December 19, 1997.

Please do not hesitate to contact us if you have any questions.

Respectfully submitted,


Charles D. Smith


Kurtis A. Tunnell

Enclosure

cc: F. Andrew Turley, Supervisory Attorney, Central Enforcement Docket (w/ encl.)

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4667

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The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-19-97
Date

[Signature]
Signature

RESPONDENT'S NAME: Roger R. Geiger, Treasurer

ADDRESS: Keep Ohio Working

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