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August 14, 2001

Lois G. Lerner
Office of General Counsel
Federal Election Commission
999 E. Street, NW
Washington, D.C. 20463

RE: MUR 4814

Dear Ms. Lerner:

On behalf of my client, CHARLENE SPEARS, we are in receipt of the General Counsel's letter of August 6, 2001, and the general Counsel's Brief enclosed with that letter.

The General Counsel's brief is 14 pages long. I reflects the results of an investigation that the Office of General Counsel has been conducting for nearly two years, and that has included numerous depositions, interrogatories, witness interviews and subpoenas of thousands of pages of documents from dozens of witnesses.

It will take a considerable period of time to examine and analyze the evidence cited in the General Counsel's Brief, and otherwise developed in the course of the investigation, and to prepare a response to each of the various charges set forth in the Brief. At this point, for example, none of the depositions cited in the General Counsel's Brief have yet been made available. Under these circumstances, it is clearly impossible for me to prepare a brief in response to your brief within fifteen (15) days.

Therefore, I am respectfully requesting an extension of sixty (60) days beyond the 15 day statutory period in which to file a response to the General Counsel's Brief. If this request is granted, the responsive brief on behalf of Charlene Spears would be due on October 19, 2001.

Charlene Spears is willing to execute an agreement to toll the statute of limitations as to the alleged violations set forth in the General counsel's brief for a period of sixty days.

In addition, as General Counsel's Brief relies on the depositions of individuals as is set out in the requests of other counsel for other respondents. I would also request that the commission make available all transcripts of all depositions taken the course of this investigation. I believe that as other parties already have these depositions, do you have any problem if I obtain the same from them? Any dely in making these transcripts available will of course prejudice my ability to prepare a response and may necessitate a request for an addition time.

Please advise me as to whether or not my requested is acceptable.

Yours truly,

Warren Gotcher

WG/sw