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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

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July 20, 2001

Via Facsimile and First Class Mail

Margaret J. Toalson, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 4818

Dear Ms. Toalson:

On behalf of our clients, respondents Senator Gene Stipe and The Stipe Law Firm, we are in receipt of the General Counsel's letter of July 12, 2001 and the General Counsel's Brief enclosed with that letter.

The General Counsel's brief is 45 pages long. It 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 to us. Under these circumstances, it is clearly impossible for counsel for Senator Stipe and The Stipe Law Firm to prepare a brief in response to the General Counsel's Brief within fifteen (15) days.

Margaret J. Toalson, Esq.

July 20, 2001

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For these reasons, we respectfully request that Senator Stipe and the Stipe Law Firm be granted 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 Senator Stipe and The Stipe Law Firm would be due on September 26, 2001.

Senator Stipe and The Stipe Law Firm are 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, the General Counsel's Brief relies on the depositions of the following individuals in making numerous factual allegations upon which its recommendations are based:

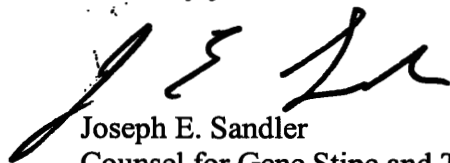
Gene Stipe
Walt Roberts
Jimmy Lane
Charlene Spears
Anne Prather

Further, we are aware that OGC took a number of other depositions in the course of its investigation of this matter, which depositions are likely to contain factual information directly relevant to the allegations made in the General Counsel's Brief.

It is obviously impossible for Senator Stipe and The Stipe Law Firm to prepare a meaningful response to the General Counsel's Brief without access to the results of the Commission's investigation. Accordingly, we request that the Commission immediately make available to us transcripts of all of the depositions taken in the course of this investigation, by providing us the names and phone numbers of the court reporters and authorizing the court reporters to make those transcripts available to us. Any delay in making these transcripts available will, of course, prejudice our ability to prepare a responsive brief and may necessitate a request for an additional extension of time.

Thank you for your time and prompt attention to these requests.

Sincerely yours,



Joseph E. Sandler
Counsel for Gene Stipe and The
Stipe Law Firm

cc: James E. Frasier, Esq.