



April 3, 2003

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FEDERAL ELECTION

COMMISSION

OFFICE OF GENERAL

COUNSEL

BY FACSIMILE

Lawrence M. Norton, Esq
General Counsel
Federal Election Commission
Washington, DC 20463

Re: MURs 4935 and 5057

Dear Mr. Norton:

Yesterday, we received the briefs prepared by the Office of General Counsel to support findings of probable cause in the above-referenced matters. The circumstances make it impossible for our clients to respond by April 17, as your letters indicate they must.

First, as you no doubt know, April 17 is the first full day of Passover. As you also know, our clients are strictly observant Jews who must prepare for and observe this important holiday. Second, the briefs rely on factual materials that neither we nor our clients have had an opportunity to review. These include transcripts of depositions apparently taken from Nick Lagemann and Scott Garrison, and sworn statements apparently obtained from several Committee donors. Our clients cannot effectively respond to the briefs' factual allegations without having had an opportunity to review the materials on which these allegations principally rely.

Accordingly, we respectfully request the Office of General Counsel to grant our clients until the close of business Wednesday, May 7, to respond to the briefs, while providing us with copies of the above-referenced factual materials as soon as possible. This is a modest 20-day extension that we believe is essential to the Commission's fair consideration of this matter. Please feel free to contact either of us if you wish to discuss this request further.

Very truly yours,

Marc E. Elias
Brian G. Svoboda
Counsel to Respondents

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cc: Peter Blumberg, Esq.
Delbert Rigsby, Esq.
Danita Lee, Esq.

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