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May 21, 2001

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VIA COURIER

Elizabeth F. Williams
Attorney
Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 5199
Bush-Cheney 2000, Inc. and David Herndon, as Treasurer

Dear Ms. Williams:

This requests an extension of time on behalf of our client, Bush-Cheney 2000, Inc. and David Herndon, as treasurer ("Campaign"), to respond to the complaint filed by the Democratic National Committee in the above referenced matter. The Statement of Designation of Counsel is attached.

The Federal Election Commission ("Commission") is currently auditing the Campaign pursuant to 26 U.S.C. § 9007(a) and has requested financial information concerning recount activities. To date, the Campaign has disclosed to the Commission's audit staff financial information concerning allocable expenses between the Campaign and the recount fund. The Campaign is currently engaged in discussions with the audit staff concerning other recount financial information. Accordingly, we respectfully move that the Commission stay this MUR's proceedings until these issues are resolved pursuant to the Commission's audit. This stay will permit the audit to proceed in an orderly manner and the audit staff and the Campaign to work through these novel legal issues. Otherwise, the Campaign will be forced to evaluate any requests from the audit staff about recount financial information in conjunction with this MUR's proceedings.

In the event our motion is denied, we request a thirty-day extension of time to respond to the DNC's complaint. The complaint was received on May 8, 2001, and the response is currently due May 23, 2001. The thirty-day extension of time will permit us the time necessary to evaluate the novel legal issues involving a presidential recount and, at the least, will allow a discussion of the issues raised by the audit to continue unimpeded. Accordingly, we respectfully request a

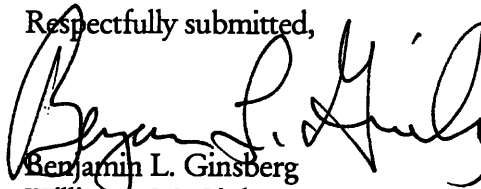
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thirty-day extension of time, or until June 22, 2001, to respond to the complaint in the event that our motion to stay this MUR's proceedings is denied.

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

Respectfully submitted,



Benjamin L. Ginsberg
William J. McGinley

Attachment

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 5199

NAME OF COUNSEL: Ben Ginsberg

FIRM: Patton Boggs LLP

ADDRESS: 2550 M Street N.W.

Washington D.C.

TELEPHONE: (202) 457 6000

FAX: (202) 457 6315

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.

5/17/01
Date

[Signature]
Signature

RESPONDENT'S NAME: Bush-Cheney 2000 Inc

ADDRESS: PO Box 23044

Washington DC 20026

TELEPHONE: HOME() _____

BUSINESS: (202) 554 7390