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October 14, 2004

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

2004 OCT 14 A 11:56

BY HAND AND FACSIMILE

Tracey L. Ligon, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20004

Re: MUR 5390

Dear Ms. Ligon:

As you know, we are representing Freddie Mac in connection with the above-captioned matter under review. We received on October 6, 2004 the Commission's September 30, 2004 letter notifying us of its reason to believe finding concerning Freddie Mac. Accordingly, Freddie Mac's response would ordinarily be due on October 21, 2004. As I indicated during our telephone conversation last Friday, we request that the staff grant us an extension of 30 days within which to file a response. If this extension is granted, Freddie Mac's response would be due on Monday, November 22, 2004.

The staff's Factual and Legal Analysis presents a range of disparate issues to which Freddie Mac intends to respond. Preparation of an adequate response may require, among other things, collection of information from current employees, former employees, and outside consultants, including those referenced in the Commission's letter. To the extent that any of those individuals are themselves the recipients of reason to believe letters, they may have their own election law counsel. In view of the fact that the Commission issued reason to believe letters just before a national election, all election law counsel are likely to be heavily engaged in providing Federal Election Campaign Act compliance advice to participants in the federal election process. This may delay the collection of information necessary for preparation of Freddie Mac's response. Given the number of issues presented for response and the imminent

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national election, a 30-day extension for Freddie Mac's response is necessary and reasonable in the circumstances.

If we may answer any questions that would assist the staff in evaluating our request for an extension please feel free to contact me at (202) 662-5503. With respect to the extension in particular, your prompt response would be very much appreciated.

Respectfully submitted,



Robert K. Kelner

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