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May 5, 2004

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
2004 MAY 10 A 11:35

Via Facsimile and First Class Mail

Elaine Devine
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Moveon.org Voter Fund, Respondent

Dear Ms. Devine:

The undersigned represents respondent Moveon.org Voter Fund. ("Moveon") in the above-referenced MUR. A Statement of Designation of Counsel is attached hereto.

The Complaint filed by the Republican National Committee and Bush-Cheney '04 is hundreds of pages long. It describes or refers to hundreds of alleged activities and transactions by numerous different groups. A considerable amount of time will be required to review the facts alleged in the Complaint, as they pertain specifically to respondent Moveon, and to determine the facts so that a meaningful substantive response can be submitted. It will not be possible to do this in the initial 15-day period.

Furthermore, a continuing rulemaking procedure regarding the definition of a political committee that is currently ongoing at the Commission is directly relevant to this matter. It is our understanding that a final rule for this rulemaking procedure will be taken up by the Commission at a meeting on May 13, 2004. The issues raised at that meeting may be dispositive to the outcome of this matter. Accordingly, our office will need to evaluate the actions taken by the Commission in the rulemaking procedure before moving forward in responding to the complaint in this matter.

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For these reasons, we respectfully request an extension of twenty (20) days in which to file a response to the Complaint. The complaint was received by Moveon on April 27, 2004. If this request is granted, Moveon's response to the Complaint would be due on June 1, 2004.

Thank you for your time and attention to this request.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Neil P. Reiff', written over the typed name.

Neil P. Reiff
Counsel for Respondent
Moveon.org Voter Fund

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STATEMENT OF DESIGNATION OF COUNSEL

(Please use one form for each respondent.)

MUR _____

NAME OF COUNSEL: Jai Sandler + Neil RiffFIRM: Sandler + RiffADDRESS: _____

TELEPHONE: (____) _____

FAX: (____) _____

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.

Wesley Bayl
Print Name5/4/2004
Date[Signature]
SignaturePresident
TitleRESPONDENT'S NAME: Mac Onery Water FundADDRESS: _____

TELEPHONE: HOME:

BUSINESS: 516 558-1328

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