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June 12, 2015

CONFIDENTIAL

Via Hand Delivery

Lisa J. Stevenson
Deputy General Counsel - Law
Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 6850 - request for extension and consent for tolling

Dear Ms. Stevenson:

On behalf John Swallow I respectfully request a 30-day extension of time for filing a response brief in the above-captioned matter. The relevant record is quite extensive, and my firm will need to conduct significant factual and legal research to provide the Commission with the evidence and analysis that rebuts the assumptions underlying the General Counsel's Brief.

Enclosed with this letter is a signed Consent to Extend the Time to Institute a Civil Law Enforcement Suit. This should provide you the timing relief needed to grant the requested extension of time.

Please advise me as soon as possible of your disposition of this request.

Sincerely,



Scott E. Thomas
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Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

John Swallow

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MUR 6850

**CONSENT TO EXTEND THE TIME
TO INSTITUTE A CIVIL LAW ENFORCEMENT SUIT**

As consideration for the Federal Election Commission granting an extension to respond to the General Counsel's Brief in this matter, Respondent, John Swallow, hereby consents to toll the statute of limitations for any civil enforcement suit that the Commission might institute pursuant to 52 U.S.C. § 30109(a)(6) for a period of 30 days.

This agreement will extend the time to institute a civil law enforcement suit for a period of 30 calendar days from the expiration date of the five-year statute of limitations found at 28 U.S.C. § 2462 or any other statute of limitations or repose that may be applicable in this matter.

There shall be no additional consent to extend the time to institute a civil law enforcement suit without the written consent of the Respondent.



Scott E. Thomas
Counsel for Respondent



Date