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August 28, 2018

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by Kathryn Ross
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BY EMAIL (CELA@FEC.GOV)

Mr. Jeff S. Jordan, Assistant General Counsel
Attn: Ms. Kathryn Ross, Paralegal
Office of Complaints Examination and Legal Administration
Federal Election Commission
1050 First Street, NW
Washington, DC 20463

Re: Matters Under Review 7332 and 7407

Dear Mr. Jordan:

This office represents American Media, Inc. ("AMI"), David Pecker, and Dylan Howard in Matters Under Review ("MURs") 7332 and 7407, as appropriate. This office received Amended Complaints in both MURs on August 14, 2018. Ordinarily responses would be due within 15 days, but we respectfully request a 30-day extension of time to respond to the Amended Complaints, until September 28, 2018, to submit responses.

Good cause exists because the Amended Complaints present new information referenced in news articles and an alleged audio tape beyond the Respondents' personal knowledge and direct access. We need additional time to confer with our clients, investigate the new information, and compile an appropriate response. This process is delayed due to August vacations and the upcoming Labor Day vacation. The new information alleged implicates serious First Amendment issues rooted in AMI's free press rights. The gravity of the issues justify time for full development and analysis. The extension will afford our office the time necessary to investigate the facts in the possession of third parties and address the sensitive First Amendment rights at issue for presentation to the Commission.

I appreciate the Commission's accommodation of additional time in this matter. Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew G. Woodson".

Andrew G. Woodson