

From: Cavoli, James
To: [CELA](#)
Cc: [Fee, Adam](#); [Cavoli, James](#)
Subject: RE: MURs 7350/7351
Date: Wednesday, May 02, 2018 2:46:40 PM

Dear Mr. Jordan: Please be advised that Milbank is no longer authorized to represent Cambridge Analytica and SCL Group Ltd in the above-referenced matters, and, as such, we are withdrawing as counsel.

Regards,

James Cavoli | Milbank
Partner
[28 Liberty Street | New York, NY 10005](#)
T: +1 212.530.5172 | F: +1 212.822.5172
jcavoli@milbank.com | www.milbank.com

From: Cavoli, James
Sent: Tuesday, April 24, 2018 6:00 PM
To: 'cela@fec.gov' <cela@fec.gov>
Cc: Fee, Adam <AFee@milbank.com>; Cavoli, James <JCavoli@milbank.com>
Subject: MURs 7350/7351

Dear Mr. Jordan,

Milbank, Tweed, Hadley & McCloy has been retained to represent **Cambridge Analytica** and **SCL Group Ltd.** in **MUR 7351** (complaint filed by Common Cause), and **Cambridge Analytica** in **MUR 7350** (complaint filed by J. Whitfield Larrabee and Resistance Committee Action Fund) (collectively, the “Complaints”).

We write to provide the requisite Statements of Designation of Counsel, which are attached to this email.

We also write to respectfully seek an adjournment of the date by which Cambridge Analytica and SCL Group must respond to the Complaints, which, we submit, is warranted for a host of reasons.

Milbank was just very recently retained with respect to the above FEC matters, which involve allegations that are the subject of much public attention, and date back several years in some instances. In addition, several of the allegations are based on press reports that purport to convey facts, but do so in blanket and conclusory fashion. It will take some time to gather and evaluate primary source materials that reflect accurate factual details, and to confer with individuals with personal knowledge of pertinent issues, facts and allegations (some of which may no longer be employed by Cambridge Analytica or SCL Group). These steps are necessary in order for our clients to craft and submit accurate and thoughtful responses to the Complaints, which they are entitled to do.

In addition, in late March 2018, the UK's Information Commissioner's Office raided and searched Cambridge Analytica's facilities, and seized computers, servers, and paper files, among other things. These activities may also hamper our information gathering efforts, and thus our ability to respond. Certain aspects of the Complaints are also the focus of civil litigation in both federal and state courts (an action to consolidate multiple class action suits is pending), and investigations by various state attorneys general.

For these reasons, it is essentially impossible to properly respond to the Complaints without significant additional time. (As we calculate it, the current due date is April 28, 2018: 15 days from April 13, the date that the Complaints were received by our clients.) Accordingly, we respectfully request a return date **of June 15, 2018** to respond to the Complaints.

Respectfully submitted,

James Cavoli

James Cavoli | Milbank
Partner
[28 Liberty Street | New York, NY 10005](https://www.milbank.com)
T: +1 212.530.5172 | F: +1 212.822.5172
jcavoli@milbank.com | www.milbank.com

=====

This e-mail message may contain legally privileged and/or confidential information. If you are not the intended recipient(s), or the employee or agent responsible for delivery of this message to the intended recipient(s), you are hereby notified that any dissemination, distribution or copying of this e-mail message is strictly prohibited. If you have received this message in error, please immediately notify the sender and delete this e-mail message from your computer.