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June 29, 2020

Federal Election Commission
Office of Complaints Examination and Legal
Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

Re: Extension for response to MUR 7731 for
Respondent National Right to Life Victory
Fund Wayne Cockfield, Treasurer

Dear Ms. Dennis,

This Firm represents National Right to Life Victory Fund Wayne Cockfield, Treasurer and also represents Minnesota Citizens Concerned for Life, Inc. Federal PAC (collectively, “Respondents”) in the Matter Under Review (“MUR”) 7731. On May 4, both Respondents received notification of the complaint that is the subject of this MUR.

52 U.S.C. § 30109(a)(1) provides Respondents the opportunity to demonstrate in writing that the Commission should take no further action within fifteen (15) days of notification. Respondent has requested and been granted extensions for the response to the above-noted MUR until July 2, 2020. Respondents now request a further 32-day extension.

Both Respondents will present complete defenses to the claims at issue—which claims are, principally, that each Respondent violated 11 C.F.R. § 109.21 or § 109.37. A defense against coordination inherently requires investigating, collating, and authenticating diverse records. This work is being done during an election year, Respondents’ busiest time, and their staff are generally working remotely. Respondents have thus far gathered and provided to counsel over 1000 email strings and documents and have today notified the Firm that “hundreds” more are forthcoming.

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Responsibly presenting Respondents' defense requires the Firm to review of all the pertinent evidence. Pertinent evidence regarding a claim of coordination is inherently expansive. Gathering all the necessary evidence in an election year with remotely-working staff has proven to take far more time than anticipated, and reviewing and analyzing the documents will be time-consuming as well. As a result, Respondent respectfully requests an additional extension for its response to August 3, 2020.

Respondent hereby agrees to toll the applicable statute of limitations commensurate with this extension to the extent that tolling is required by Commission rule or policy.

Sincerely,

THE BOPP LAW FIRM, PC

A handwritten signature in black ink, appearing to read "Jeff P. Gallant", with a long horizontal flourish extending to the right.

Jeffrey P. Gallant
James Bopp, Jr.