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November 2, 2020

By Electronic Mail

Jeff S. Jordan
Assistant General Counsel
Federal Election Commission
Office of Complaints Examination
& Legal Administration
1050 First Street, NE
Washington, DC 20463
E-mail: cela@fec.gov

Re: MUR 7835 - *Complaint against WMTW-TV, Portland, Maine*

Dear Mr. Jordan:

We represent Hearst Stations Inc., which is the licensee of WMTW-TV ("WMTW" or "Station"), regarding the Complaint (the "Complaint") filed with the Federal Election Commission ("Commission") by Max Linn ("Linn"), a candidate for one of Maine's seats in the United States Senate.

We received notice of the Complaint on October 29, 2020. We respectfully request a 28-day extension of time to prepare our response to the Complaint. This 28-day extension, along with the 15 days provided under Section 30109(a)(1), would make our response due on Friday, December 11, 2020.

The extension is necessary to allow us time to review the complaint, interview witnesses, draft declarations, research the applicable laws, and prepare a response letter. Our efforts to prepare WMTW's response will be complicated by the Station's coverage of Election Day and subsequent events, which will affect the availability of witnesses. The additional time will ensure that we can submit a thorough response that disposes of the Complaint's allegations and arguments, thus requiring no further action by the Commission.

We recognize that Mr. Linn's counsel has asked the Commission to conduct expedited review of his complaint. As you know, such expedited action is not permitted. Section 30109(a)(1) prohibits the Commission from "conduct[ing] any vote on the complaint, other than a vote to dismiss" until the Commission has afforded the respondent fifteen (15) days to provide a written response. 52 U.S.C. § 30109(a)(1). Furthermore, Mr. Linn's justification for expedited review is moot: Mr. Linn sought expedited review because he hoped that the Commission would

Mr. Jeff S. Jordan
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take action before the debate hosted by WMTW; but WMTW did not receive the Commission's notice of the Complaint until after the debate (which occurred on October 28, 2020).

We have also enclosed the counsel designation form for Mark Prak and Craig Schauer, who will be representing WTMW in this matter.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be "C. D. S.", which likely represents both Mark J. Prak and Craig D. Schauer.

Mark J. Prak
Craig D. Schauer
Counsel to Hearst Stations Inc.

Enclosure



FEDERAL ELECTION COMMISSION
1050 First Street, NE
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL cela@fec.gov

FAX 202-219-3923

AR/MUR/RR/P-MUR# 7835

Name of Counsel: Mark Prak ; Craig Schauer

Firm: Brooks Pierce

Address: 150 Fayetteville St., Suite 1700
Raleigh, NC 27601

Office#: 919-839-0300 Fax#: 919-839-0304

Mobile#: _____

E-mail: mparak@brookspierce.com ; cschauer@brookspierce.com

The above-named individual and/or firm 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.

11/2/2020

Date

/s/ David Abel

(Signature - Respondent/Agent/Treasurer)

General Manager

Title

David Abel

(Name - Please Print)

WMTW-TV

RESPONDENT:

(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 4 Ledgeview Drive
(Please Print)

Westbrook, ME 04092

Home#: _____ Mobile#: _____

Office#: 207-835-3880 Fax#: 207-761-0212

F-mail: dabel@hearst.com

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 5, 2020

Via Electronic Mail Only
mprak@brookspierce.com
cschauer@brookspierce.com

Mark Prak
Craig Schauer
Brooks Pierce
150 Fayetteville St, Suite 1700
Raleigh, NC 27601

RE: MUR 7835
WMTW-TV

Dear Counsel:

This is in response to your request for an extension to respond to the complaint filed in the above mentioned matter we received on November 2, 2020. After considering the circumstances in the matter, the Office of General Counsel has decided to grant the requested extension. Accordingly, your client's response is due on or before the close of business on December 11, 2020.

If you have any questions, please contact me at (202) 694-1519 or cela@fec.gov.

Sincerely,

A handwritten signature in blue ink that reads "Christal Dennis".

Christal Dennis, Paralegal
Complaints Examination and
Legal Administration