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December 21, 2021

By email to CELA@fec.gov

Roy Q. Luckett Acting Associate General Counsel Office of Complaints Examination & Legal Administration Federal Election Commission 1050 First Street, NE Washington, DC 20463

> Re: RR 21L-71 Workers Vote

Dear Mr. Luckett:

I am writing on behalf of respondent Workers Vote per the designation of counsel that was emailed to your office yesterday in order to request a 30-day enlargement of time within which to respond to the December 17 referral from January 3 to February 2, 2022.

For all practical purposes, due to the holidays no personnel familiar with the matters at issue or responsible for administering Workers Vote are available until January 3, the current response due date. The committee's Treasurer, Zaina Tannu, is on vacation during this period, and, following her receipt of the referral, nonetheless acted specially to contact the undersigned and prepare and submit the designation of counsel. At least one of the lead personnel for the committee's compliance firm who is familiar with this matter is also away and not expected back until the first week of January. I will also be on vacation for at least one week between now and January 3.

When work generally resumes during the first week of January, all pertinent personnel are expected to have a significant backlog of work, and most have been working remotely for some time due to the pandemic, a situation that appears unlikely to change soon. I also have some significant professional commitments during January. Meanwhile, we are aware that the referral concerns 21 Forms 3X, the underlying circumstances that led to the 16 amendments of the five reports at issue were complex and factintensive, and we wish to ensure that our response is informative and appropriate.

Mr. Roy Q. Luckett FEC Page 2

The requested enlargement of time will have no practical bearing on the operation of the statute of limitations in this matter, as the referral concerns compliance with the Federal Election Campaign Act of Forms 3X that have been submitted since October 15, 2020.

Accordingly, Workers Vote respectfully requests that this brief enlargement of time to respond be granted. Thank you for your consideration.

Yours truly,

Laurence E. Gold

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Counsel for Respondent Workers Vote

cc: Zaina Tannu, Treasurer