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March 24, 2020

**VIA EMAIL: CELA@FEC.GOV**

Jeff S. Jordan, Esq.  
Assistant General Counsel  
Complaints Examination & Legal Administration  
Federal Election Commission  
1050 First Street, N.E.  
Washington, D.C. 20463

**Re: MUR 7720**

Dear Mr. Jordan:

We write as counsel to Representative Madeleine C. Dean and Friends of Madeleine Dean (“Respondents”), in the above-referenced matter. With this letter, please find enclosed copies of designation of counsel statements executed on behalf of each Respondent.

Respondents received the complaint on Thursday, March 19, 2020. Given the extraordinary circumstances presented by the national emergency concerning the COVID-19 pandemic,<sup>1</sup> Respondents respectfully request a 90-day extension, until July 2, 2020, to respond to the Complaint. The extension is needed so that Respondents and their agents can obtain and review responsive information, even while facing extreme disruption in their communities and daily work. For example, Representative Dean’s home county of Montgomery County, Pennsylvania now operates under a “stay-at-home” order issued by the Governor, effective until at least April 6, 2020.<sup>2</sup> These circumstances will necessarily interfere with the ability of Respondents to obtain and review the information needed to rebut the Complaint’s allegations effectively.

While a 90-day extension is unusual in Commission practice, it is consistent with other measures taken by governmental agencies in the wake of the national emergency.<sup>3</sup> If the Commission is

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<sup>1</sup> See Proclamation No. 9994, 85 Fed. Reg. 15,337 (Mar. 13, 2020), *available at* <https://www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/>.

<sup>2</sup> See Pa. Exec. Order (Mar. 23, 2020), *available at* <https://www.governor.pa.gov/wp-content/uploads/2020/03/03.23.20-TWW-COVID-19-Stay-at-Home-Order.pdf>.

<sup>3</sup> See, e.g., U.S. Internal Revenue Serv., Press Release, *Tax Day now July 15: Treasury, IRS extend filing deadline and federal tax payments regardless of amount owed* (Mar. 21, 2020), <https://www.irs.gov/newsroom/tax-day-now-july-15-treasury-irs-extend-filing-deadline-and-federal-tax-payments-regardless-of-amount-owed> (extending federal tax deadline 90 days until July 15, 2020); U.S. Court App. for the Ninth Cir., COVID-19 Notice (Mar. 20, 2020), *available at* <http://cdn.ca9.uscourts.gov/datastore/general/2020/03/16/COVID-19%20Notice.pdf> (providing a presumptive 60-day extension for the filing of briefs in case of logistical issues presented by COVID-19).

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not prepared to grant an extension of such length at this time, then Respondents would alternatively seek an extension of 45 days—15 days beyond that which the Commission normally grants—along with leave to seek an additional extension, if necessary, which may be granted upon good cause shown.

We appreciate the Commission's consideration of this request. Please do not hesitate to contact us if you have any questions regarding this matter.

Very truly yours,

A handwritten signature in dark ink, appearing to read "B. Svoboda", followed by a horizontal line.

Brian G. Svoboda  
Shane A. Grannum  
Counsel to Respondents

Enclosure

**Washington, DC 20463**

**FAX (202) 219-3923**

Rev. 2010



**FEDERAL ELECTION COMMISSION**  
**999 E Street, NW**  
**Washington, DC 20463**

**STATEMENT OF DESIGNATION OF COUNSEL**  
 Please use ***one*** form for each Respondent/Entity/Treasurer  
**FAX (202) 219-3923**

**MUR #** 7720

**NAME OF COUNSEL:** Brian G. Svoboda

**FIRM:** Perkins Coie, LLP

**ADDRESS:** 700 Thirteenth St., N.W. Suite 800

Washington, DC 20005


**TELEPHONE- OFFICE** ( 202 ) 654-6200

**FAX** ( 202 ) 654-6211 **Web Address** www.perkinscoie.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.

3-24-20

**Date**



**Respondent/Agent -Signature**

Candidate

**Title(Treasurer/Candidate/Owner)**

**RESPONDENT:** Representative Madeleine C. Dean  
 (Committee Name, Company Name, or Individual Named in Notification Letter)

**MAILING ADDRESS:** \_\_\_\_\_  
 (Please Print)

Jenkintown, PA 19046-1528

**TELEPHONE- HOME** (    ) \_\_\_\_\_

**BUSINESS** (    ) \_\_\_\_\_

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation