

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

CHRISTIAN CIVIC LEAGUE OF)
MAINE, INC.,)
)
Plaintiff,)
)
v.)
)
FEDERAL ELECTION COMMISSION)
)
Defendant.)

Case No. 1:06CV00614

DECLARATION OF KEVIN DEELEY

1. I, Kevin Deeley, hereby declare as follows:

2. I am counsel for the Defendant Federal Election Commission (“Commission”) in the above-captioned case.


3. Plaintiff Christian Civil League of Maine, Inc. (“CCL”) filed a complaint and preliminary injunction motion in this action on April 3, 2006. Pursuant to plaintiff’s request for a rapid briefing schedule, the Commission has agreed to file its opposition by April 17, 2006.

4. On April 6, 2006, I informed Jeffrey Gallant, an attorney for CCL, that the Commission intended to move for expedited discovery and I emailed him copies of the Commission’s proposed Notice of Deposition, First Set of Interrogatories, and First Set of Requests for the Production of Documents. True and accurate copies of those documents are attached as Exhibits 1 through 3, respectively.

5. Later on April 6, 2006, counsel for the parties held a conference call. Joining me on the call were David Kolker, another attorney for the Commission, and James Bopp and Jeffrey Gallant of Bopp, Coleson, & Bostrom on behalf of CCL. I also had several additional

phone calls with Mr. Gallant after the conference call. Over the course of those phone calls, counsel for plaintiff indicated that they opposed some portions of the Commission's discovery requests. They agreed not to oppose the Commission's motion for expedited discovery, however, with the proviso that they were preserving their objections to the proposed discovery and subject to their client's ability to comply timely with the discovery requests. Subject to those reservations, they agreed to comply with all of the discovery requests with the exception that they would not provide the identities of CCL's corporate contributors at this time without a protective order. The parties agreed to move the 30(b)(6) deposition of CCL to 10:00 a.m. on April 13, 2006.

6. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.



Kevin Deeley
Attorney
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Executed on this 6th day of April, 2006.