

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SENATOR MITCH McCONNELL, et al.,)	
)	
Plaintiffs,)	Civ. No. 02-582
)	(CKK, KLH, RJL)
v.)	
)	CONSOLIDATED ACTIONS
)	
FEDERAL ELECTION COMMISSION, et al.,)	
)	
Defendants.)	
)	
)	
NATIONAL RIFLE ASSOCIATION, et al.,)	
)	
Plaintiffs,)	Civ. No. 02-581
)	(CKK, KLH, RJL)
v.)	
)	
FEDERAL ELECTION COMMISSION, et al.,)	
)	
Defendants.)	
)	
)	
EMILY ECHOLS, et al.,)	
)	
Plaintiffs,)	Civ. No. 02-633
)	(CKK, KLH, RJL)
v.)	
)	
FEDERAL ELECTION COMMISSION, et al.,)	
)	
Defendants.)	
)	

In response to the Court's Order of November 15, 2002 concerning oral argument, plaintiffs in *McConnell v. FEC*, Civ. No. 02-582, *National Rifle Association v. FEC*, Civ. No. 02-581, *Echols v. Federal Election Commission*, Civ. No. 02-633, *Chamber of Commerce of the United States v. FEC*, Civ. No. 02-751, *National Association of Broadcasters v. FEC*, Civ. No. 02-753, *AFL-CIO v. FEC*, Civ. No. 02-754, *Republican National Committee v. FEC*, Civ. No. 02-874; *California Democratic Party v. FEC*, Civ. No. 02-875 and *Thompson v. FEC*, Civ. No. 02-881 hereby advise the Court as to the names of arguing counsel, the issue(s) each counsel plans to address, and the length of each counsel's argument. In accordance with the Court's Order, all times listed for plaintiffs' counsel include time, if any, that may be reserved for rebuttal.

Together with (and at the request of) defendants, plaintiffs respectfully request a slight adjustment to the schedule set by the Court (which would not lengthen the time allotted or impact the *Paul* or *Adams* plaintiffs) to permit counsel to present sufficient argument on the important coordination issues raised by the case in the most effective manner. Thus, the parties jointly request that the Court permit argument on the coordination issues to be heard on Thursday, December 5, 2002 at the time scheduled for Title III, immediately to be followed by argument on Title III, with the time allotted for Titles III and V shortened accordingly. If adjusted, the time per side, per Title would be as follows: Title I - 90 minutes; Title II - Electioneering Communications - 90 Minutes; Title II - Coordination/Title III - 55 minutes (instead of 45); Title V and Section 305 - 20 minutes (instead of 30). The schedule below reflects that slight adjustment requested by defendants. If the Court does not permit the slight adjustment, plaintiffs will promptly submit a revised schedule to the Court.

Wednesday, December 4, 2002

TITLE I:

Kenneth W. Starr (20 minutes)
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Attorney for Senator Mitch McConnell,
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and U.S. d/b/a Pro English

Deborah B. Caplan (20 minutes)
Olson, Hagel & Fishburn LLP

Attorney for California Democratic Party,
Art Torres, and Yolo County Democratic
Central Committee

Sherri L. Wyatt (5 minutes)
Sherri L. Wyatt, P.C.

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and Representative Earl F. Hilliard

Bobby R. Burchfield (35 minutes)
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Attorney for Republican National Committee,
Mike Duncan, Republican Party of Colorado,
Republican Party of Ohio, Republican Party of New Mexico,
and Dallas County (Iowa) Republican County Central Committee

TITLE II - Electioneering Communications:

Floyd Abrams (43 minutes)
Cahill Gordon & Reindel

Attorney for Senator Mitch McConnell and
the National Association of Broadcasters

Laurence E. Gold (9 minutes)
AFL-CIO

Attorney for the American Federation of Labor and
Congress of Industrial Organizations and AFL-CIO Committee
on Political Education Political Contributions Committee

Joel M. Gora (9 minutes)
Brooklyn Law School

Attorney for American Civil Liberties Union

Charles Cooper (19 minutes)
Cooper & Kirk

Attorney for National Rifle Association of America
and National Rifle Association Political Victory Fund

Thursday, December 5, 2002

TITLE II - Coordination Issues:

Jan Witold Baran (25 minutes)
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and Contractors, Inc., Associated Builders and Contractors Political
Action Committee, Chamber of Commerce of the United States,
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TITLE II - Coordination Issues (cont'd):

Charles H. Bell, Jr. (5 minutes)
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Timothy Morgan, Barbara Alby, Santa Cruz Republican
Central Committee, and Douglas R. Boyd, Sr.

TITLE III - Section 318:

James Matthew Henderson, Sr. (10 minutes)
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Isaac McDow, Jessica Mitchell, Daniel Solid,
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TITLE V and Section 305:

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November 22, 2002

Respectfully submitted:

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Certificate of Service

This is to certify that on November 22, 2002, I caused a true and correct copy of the foregoing Plaintiffs' Response to the Court's Order of November, 15, 2002 Concerning Oral Argument to be served by facsimile (except where otherwise noted) and first-class mail upon the following persons:

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