

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DEMOCRATIC CONGRESSIONAL
CAMPAIGN COMMITTEE, INC.,

Plaintiff,

v.

FEDERAL ELECTION COMMISSION,

Defendant.

CIVIL ACTION NO. 1:96CV00764-TAF

FILED

AUG 30 1996

RULE 206 JOINT MEET AND CONFER REPORT

AND PROPOSED SCHEDULING ORDER NANCY MAYER-WHITTINGTON, CLERK
U.S. DISTRICT COURT

Pursuant to Local Rule 206, on August 27, 1996, counsel for both parties met and conferred by telephone. Pursuant to Local Rule 206(d), counsel jointly report the following:

1. Counsel jointly agree that this matter does not involve contested facts and therefore can be disposed of on cross-motions for summary judgment. Thus, counsel jointly agree that this case should be placed on a fast track.
2. Counsel jointly agree that there will be no additional parties joined to this matter nor pleadings amended.
3. Counsel jointly agree that this matter should not be assigned to a Magistrate Judge.
4. Counsel jointly agree that they have been unable to settle the case.
5. Since this matter involves a question of law related to the propriety of the Federal Election Commission's (the "Commission") actions with respect to an administrative

[4031-0001/DA962400022]

8-30-96 - Let this be
filed Anthony C. Anthony
Judge

complaint filed by the Plaintiff, counsel agree that this case would not benefit from any form of alternative dispute resolution procedures.

6. Counsel jointly agree that this matter can be resolved by cross-motion for summary judgment.

7. Counsel jointly agree that the initial disclosure requirements of Rule 26(A)(1) of the Federal Rules of Civil Procedure are not applicable in this matter and should be dispensed with.

8. It is anticipated that the extent of discovery in this matter will be the Commission providing Plaintiff with a chronology of activity that the Commission has undertaken with respect to MUR 4128. Because the information contained in such a chronology must be kept confidential by law, the parties jointly agree that a protective order is appropriate. Furthermore, counsel jointly agree that a stipulated protective order should be filed with the Court no later than September 6, 1996. Assuming that the order is granted by the Court, the parties jointly agree that the Commission will provide Plaintiff's counsel with the chronology no later than two (2) days of notice of the Court's approval of the protective order.

9. Not applicable.

10. Not applicable.

11. Not applicable.

12. The parties jointly agree that at this time it does not appear that a pretrial conference will be necessary.

13. Not applicable.

In addition, counsel jointly agree to the following briefing schedule, subject to Court approval:

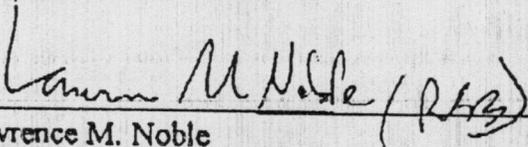
Plaintiff's Motion for Summary Judgment	2 weeks after receipt of chronology
Defendant's Opposition and Cross-Motion for Summary Judgment	30 days after filing of Plaintiff's Motion for Summary Judgment
Plaintiff's Reply	10 days after filing of Defendant's Opposition and Cross-Motion
Defendant's Reply	10 days after Plaintiff's Reply

Respectfully submitted,



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Counsel for Defendant
Federal Election Commission

Dated: August 29, 1996

IT IS SO ORDERED.

Thomas A. Flannery
JUDGE THOMAS A. FLANNERY
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Dated: 8-30-96