

Exhibit 4

Consent Motion to Extend Filing Deadlines
Campaign Legal Center v. FEC,
No. 1:16-cv-0752-TNM (D.D.C. July 8, 2016)

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

CAMPAIGN LEGAL CENTER and)
DEMOCRACY 21,)
)
Plaintiffs,)
)
v.)
)
FEDERAL ELECTION COMMISSION,)
)
Defendant,)
)
F8, ELI PUBLISHING, and)
STEVEN J. LUND,)
)
Intervenor-Defendants.)
_____)

Civil Action No: 1:16-cv-00752-JDB

CONSENT MOTION TO EXTEND FILING DEADLINES

With the consent of all parties, the Campaign Legal Center and Democracy 21 respectfully move the Court to extend the filing deadline for their Response in Opposition to Defendant’s Motion to Dismiss (Dkt. 13) from July 18, 2016 to August 2, 2016. The filing deadline for the FEC’s reply would be extended to August 26, 2016. The grounds for the motion are that plaintiffs’ lead counsel have previously scheduled professional commitments and deadlines in other cases during the month of July that will make it difficult to complete a response brief within the default period.

Plaintiffs have conferred with counsel for Defendant and Intervenor-Defendants on this motion, who indicated that they do not oppose it.

A proposed Order is attached.

Dated: July 8, 2016

Respectfully submitted,

/s/ Tara Malloy
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