

**United States District Court
District of Columbia**

**The Christian Civic League of Maine,
Inc.**

70 Sewall Street
Augusta, ME 04330,

Plaintiff,

v.

**Federal Election Commission,
999 E Street, NW
Washington, DC 20463,**

Defendant.

Cause No. _____

**Motion to Expedite and
Memorandum of Points and Authorities in Support Thereof**

Plaintiff the Christian Civic League of Maine, Inc. ("CCL"), respectfully moves to expedite this action. With this motion CCL has filed its verified complaint, motion for preliminary injunction and its brief in support of the motion for preliminary injunction, which describe in detail how § 203 of the Bipartisan Campaign Reform Act of 2002 (BCRA), in conjunction with related provisions, as applied to the facts here, violates CCL's rights to speech, association, and petitioning the government. Under BCRA § 403, (a)(4), 116 STAT.113-14, the disposition of an action brought on constitutional grounds such as this is to be "advance[d] on the docket and . . . expedite[d] to the greatest possible extent."

Motion to Expedite

Statement of Facts

CCL intends to sponsor grass-roots lobbying ads that encourage listeners to contact United States senatorial candidate Olympia Snowe and Senator Susan Collins. *See* Verified Complaint (“V.C.”) at ¶¶ 11-14. On May 14, these ads and materially similar ads will become “electioneering communications,” and since CCL is a corporation, under 2 U.S.C. § 441b(a)-(b), broadcast of the ads by CCL will be unlawful. *See id.* at ¶¶ 22-29. If CCL does not obtain declaratory and injunctive relief by May 14, it will discontinue broadcasting of its grass-roots lobbying ads because of fear of enforcement action by the FEC. *See id.* at ¶ 48. Without an order expediting the disposition of this matter, the schedule described by applicable Federal and Local Rules will delay a hearing on Plaintiff’s preliminary injunction motion well beyond May 14.

Points and Authorities

After consultation, the Parties have agreed to the following schedule:

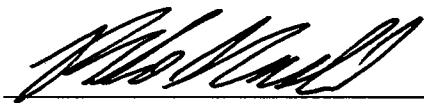
The defendant Federal Election Commission will file and serve its response to the CCL’s motion for preliminary injunction by the close of business on Monday, April 17, 2006. Plaintiff CCL will file and serve a reply by close of business on Friday, April 21, 2006. The parties agree that each will be prepared for a hearing on the motion at any time beginning on Monday, April 24, 2006.

The drafters of the BCRA recognized the need for rapid resolution of questions of its application and effect and this Court recognizes the need for rapid resolution of time-sensitive questions of law such as those affecting elections. In order to dispose of CCL’s preliminary injunction motion in time to avoid depriving it of constitutional rights, CCL

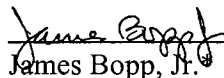
moves that both the briefing and the hearing of its motion be expedited so that a decision can be reached prior to May 14, 2006. CCL respectfully notes that a three-judge court is empaneled on April 10 to hear arguments in *Wisconsin Right to Life, Inc. v. FEC*, Case No. 04-1260 (DBS, RWR, RJL).

Pursuant to Local Rule of Civil Procedure 7(m), CCL has conferred with legal counsel for the FEC regarding whether this matter should be expedited. The response of the FEC has been separately submitted to the Court in the *Notice of Consultation on Motions With Opposing Counsel*, which conveniently consolidates opposing counsel's positions on all motions being filed contemporaneously with this one.

Respectfully submitted,



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**Pro Hac Vice Motion filed April 3, 2006*

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Order Granting Expedition

This action is before the Court on Plaintiff the Christian Civic League of Maine's ("CCL") motion for expedition and the Parties's agreement. The Court GRANTS the motion. The defendant Federal Election Commission will file and serve its response to the CCL's motion for preliminary injunction by the close of business on Monday, April 17, 2006. Plaintiff CCL will file and serve a reply by close of business on Friday, April 21, 2006.

Hearing on the motion is set for _____, 2006.

SO ORDERED this ____ day of _____ 2006.

United States District Judge

Order

United States District Judge

United States District Judge