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October 11, 2002

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SENT BY EMAIL, FIRST CLASS MAIL, AND FAX: (212) 259-5420

RE: *McConnell v. FEC; Adams v. FEC*

Dear Ms. Buckley:

In accordance with the Agreed Protective Order in this consolidated litigation, the *Adams* plaintiffs hereby object to the designation of the following portions of the deposition of Senator Mitch McConnell, taken on September 23, 2002, as “Highly Confidential/Counsel Only”, as specified in your October 3, 2002 letter to Ms. Keesha Daniels of Beta Reporting & Videography Services:

- Page 31, line 16 to page 34, line 17
- Page 38, line 5 to page 48, line 2
- Page 77, line 7 to page 83, line 11
- Page 89, line 14 to page 91, line 8
- Page 238, line 4 to page 260, line 5
- Page 267, line 18 to page 278, line 18

We see no permissible basis under the terms of the Agreed Protective Order for the designation of this material as “Highly Confidential/Counsel Only.” Pursuant to the terms of that order, please advise us in writing within three business days whether the designation for these portions of the deposition will be removed.

Notwithstanding these objections, the *Adams* plaintiffs reserve the right to object additionally to those portions of the deposition that were designated “Highly Confidential/Counsel Only” at the deposition itself, based on questioning regarding documents designated “Highly Confidential/Counsel Only.” Similarly, the *Adams* plaintiffs reserve the right to object to the designation of “Highly Confidential/Counsel Only” or “Confidential” for documents produced by Senator McConnell.

Sincerely,

John C. Bonifaz