

Chief Judge Leonard P. Stack
J. Caleb Boggs Federal Building
844 N. King Street
Unit 26 Room 6124
Wilmington, DE 19801-3555

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CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2015 OCT 16 PM 4:28
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October 16, 2015

Dear Judge Stark,

I'm contacting you today regarding 1:15-cv-00017-LPS Federal Election Commission vs. Christine O'Donnell.

On October 9, 2015 I was accidentally forwarded an email dialogue between my then local counsel Richard Abbott and opposing counsel Seth Nesin, who is representing the Federal Election Committee (FEC) in this case. The language of the email was quite alarming as it appears there may have been collusion. Below is the exact text of one of the emails cut and paste directly from the dialogue. The following text was written by Richard Abbott to Seth Nesin on October 9, 2015 before Mr. Abbott filed his motion to withdraw as my local counsel:

“So the individual defendants will be pro se if local Delaware Counsel cannot be retained.

If local counsel is retained, then you may proceed uninterrupted. If not, then you may still proceed with the litigation, and indeed would gain since you would then not have any opposing counsel at all since Pro Hac counsel cannot remain in the case after whatever deadline the Court sets for new local counsel to enter an appearance – a decided advantage in proving your case.”

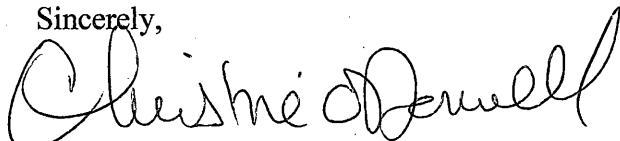
I obtained this email when Mr. Abbott forwarded a document from Mr. Nesin to me. Their email dialogue was accidentally forwarded to me as well. To me, this language suggests that Mr. Abbott has been giving the FEC tactical and strategic advice to their advantage. Unfortunately, I suspect this behavior may go back several months, perhaps to the very beginning of his representation of me in this case. For the sake of brevity, I have not listed the reasons why I suspect this, yet if your honor would like further details, they can be provided.

In light of this recent development, I am asking the court to temporarily postpone any and all upcoming deadlines until I can determine how to proceed with this. Additionally, if it is appropriate, I would like to ask for suggestions from the court.

If this letter will be made public, I also ask that my address be blacked out, if that is possible.

Thank you very much for your attention to this matter.

Sincerely,


Christine O'Donnell

County: Burlington

State: New Jersey

Witnessed before me 16 October 2015



DENISE DIBLASIO
ID # 2371307
NOTARY PUBLIC
STATE OF NEW JERSEY
My Commission Expires March 24, 2018