

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

No. 464 MD 2021

Carol Ann Carter; Monica Parrilla; Rebecca Poyourow; William Tung;
Roseanne Milazzo; Burt Siegel; Susan Cassanelli; Lee Cassanelli; Lynn Wachman;
Michael Guttman; Maya Fonkeu; Brady Hill; Mary Ellen Bachunis; Tom
DeWall;
Stephanie McNulty; and Janet Temin,

Petitioners,

v.

Veronica Degraffenreid, in Her Capacity as Acting Secretary of the
Commonwealth of Pennsylvania; and Jessica Matthis, in Her Acting Capacity as
Director of the Bureau of Election Services and Notaries,

Respondents.

No. 465 MD 2021

Philip T. Gressman; Ron Y. Donagi; Kristopher R. Tapp; Pamela A. Gorkin;
David P. Marsh; James L. Rosenberger; Amy Myers; Eugene Boman; Gary
Gordon; Liz McMahan; Timothy G. Feeman; and Garth Isaak,

Petitioners,

v.

Veronica Degraffenreid, in Her Capacity as Acting Secretary of the
Commonwealth of Pennsylvania; and Jessica Matthis, in Her Acting Capacity as
Director of the Bureau of Election Services and Notaries,

Respondents.

**STIPULATED FACTS REGARDING PROPOSED VOTER
INTERVENORS' APPLICATION FOR LEAVE TO INTERVENE**

Solely for purposes of the intervention hearing in the above matter to be held on January 6, 2022 (the Carter Petitioners expressly reserve the right to contest these facts at a future time), the Carter Petitioners and the Proposed Voters of the Commonwealth of Pennsylvania Intervenors do hereby stipulate and agree as follows:

1. Haroon Bashir resides in Philadelphia County, Pennsylvania, is registered to vote in Pennsylvania, and consistently votes in each election. Mr. Bashir intends to advocate and vote for Republican candidates in the upcoming 2022 primary and general elections. Mr. Bashir resides in the 2nd Congressional District, which the 2020 Census Redistricting Data demonstrates will be malapportioned beginning with the 118th United States Congress.

2. Valerie Biancaniello resides in Delaware County, Pennsylvania, is registered to vote in Pennsylvania, and consistently votes in each election. Ms. Biancaniello intends to advocate and vote for Republican candidates in the upcoming 2022 primary and general elections. Ms. Biancaniello resides in the 5th Congressional District, which the 2020 Census Redistricting Data demonstrates will be malapportioned beginning with the 118th United States Congress.

3. Tegwyn Hughes resides in Northampton County, Pennsylvania, is registered to vote in Pennsylvania, and consistently votes in each election. Ms.

Hughes intends to advocate and vote for Republican candidates in the upcoming 2022 primary and general elections. Ms. Hughes resides in the 7th Congressional District, which the 2020 Census Redistricting Data demonstrates will be malapportioned beginning with the 118th United States Congress.

4. Jeffrey Wenk resides in Allegheny County, Pennsylvania, is registered to vote in Pennsylvania, and consistently votes in each election. Mr. Wenk intends to advocate and vote for Republican candidates in the upcoming 2022 primary and general elections. Mr. Wenk resides in the 18th Congressional District, which the 2020 Census Redistricting Data demonstrates will be malapportioned beginning with the 118th United States Congress.

5. Petitioners in this matter, Carol Ann Carter, Monica Parrilla, Rebecca Poyourow, William Tung, Roseanne Milazzo, Burt Siegel, Susan Cassanelli, Lee Cassanelli, Lynn Wachman, Michael Guttman, Maya Fonkeu, Brady Hill, Mary Ellen Balchunis, Tom DeWall, Stephanie McNulty, and Janet Temin (the “Carter Petitioners”) previously filed a Petition for Review in April 2021 (the “*Carter I* Petition”).

6. Exhibit P-6 and Exhibit Voter-1 are true and correct copies of the Carter Petitioners’ *Carter I* Petition.

7. Proposed Intervenors Haroon Bashir, Valerie Biancaniello, Tegwyn Hughes, and Jeffrey Wenk (the “Proposed Voters of the Commonwealth of

Pennsylvania Intervenors”) applied to intervene in the *Carter I* litigation in June 2021.

8. Exhibit P-5 is a true and correct copy of the Proposed Voters of the Commonwealth of Pennsylvania Intervenors’ June 2021 Application to Intervene and Proposed Preliminary Objections.

SO STIPULATED:

On behalf of Proposed Voters of the Commonwealth of Pennsylvania Intervenors

On behalf of Carter Petitioners

GALLAGHER GIANCOLA LLC

/s/ Kathleen A. Gallagher

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Counsel for Carter Petitioners

*Counsel for Proposed Intervenors
Haroon Bashir, Valerie Biancaniello,
Tegwyn Hughes, and Jeffrey Wenk*

Dated: January 6, 2022

**CERTIFICATE OF COMPLIANCE
WITH PUBLIC ACCESS POLICY**

I certify that this filing complies with the provisions of the *Public Access Policy of the United Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

GALLAGHER GIANCOLA LLC

Dated: January 6, 2022

/s/ Russell D. Giancola
Kathleen A. Gallagher
Russell D. Giancola

CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2022, I caused a true and correct copy of the foregoing **Stipulated Facts Regarding Proposed Voter Intervenors' Application for Leave to Intervene**, to be filed via the Court's PAC File System and email, on the following :

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GALLAGHER GIANCOLA LLC

Dated: January 6, 2022

/s/ Russell D. Giancola
Russell D. Giancola