

**IN THE SUPREME COURT OF PENNSYLVANIA  
MIDDLE DISTRICT**

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LEAGUE OF WOMEN VOTERS OF	:	No. 4 MAP 2021
PENNSYLVANIA, LORRAINE HAW,	:	
AND RONALD L. GREENBLATT,	:	
ESQUIRE	:	
	:	
v.	:	
	:	
VERONICA DEGRAFFENREID, THE	:	
ACTING SECRETARY OF THE	:	
COMMONWEALTH	:	
	:	
APPEAL OF: SHAMEEKAH MOORE,	:	
MARTIN VICKLESS, KRISTIN JUNE	:	
IRWIN AND KELLY WILLIAMS	:	

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**UNOPPOSED JOINT APPLICATION FROM APPELLEES AND  
PROSPICITIVE AMICI CURIAE FOR A FIRST EXTENSION OF TIME  
TO FILE APPELLEES' BRIEF**

*Appeal from Order of the Commonwealth Court entered  
January 7, 2021 at 578 MDA 2019*

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*Counsel for Appellee Ronald Greenblatt*

Appellees, the League of Women Voters of Pennsylvania, Lorraine Haw, and Ron Greenblatt, through counsel, hereby request a one-week extension of time until April 12, 2021 to file their brief. This is Appellees' first request for an extension, and this request is joined by prospective Amici Curiae the Juvenile Law Center and Pennsylvanians for Modern Courts, who require additional time to prepare their briefs. In support thereof, Appellees and prospective Amici aver as follows:

1. This case involves complex questions regarding whether a proposed constitutional amendment to add certain victims' rights to the Pennsylvania Constitution violates Article XI, Section 1 of the Constitution because it impermissibly asks the voters to approve multiple amendments in a single ballot question.
2. Appellants previously asked this Court to issue an expedited briefing schedule and schedule argument for the Court's May sitting. Without waiting for the Court's order, Appellants filed their brief on March 2. The Court subsequently denied Appellants' request on March 11.
3. Appellees' brief is currently due on or before April 5.
4. Both Appellees and prospective Amici Curiae require additional time to prepare their briefs in this case of substantial public importance.

5. Counsel for Appellees have been working diligently to prepare their brief, but have many competing deadlines during the month of March. In addition, allowing Appellees an additional week will allow counsel for the League and Ms. Haw to better coordinate with counsel for Mr. Greenblatt on their joint brief.
6. Moreover, two prospective Amici, the Juvenile Law Center and Pennsylvanians for Modern Courts, who wish to appear in support of Appellees, join this application. The Juvenile Law Center and Pennsylvanians for Modern Courts were not previously involved in this case and require more time to fully engage with the issues. Both organizations were able to secure representation in the last few weeks. The current schedule thus affords them little time to prepare substantial briefing to aid the Court. Amici also need the one week extension of time to coordinate with one another to ensure that the amicus briefs are not redundant.
7. Amici, including Amici who appeared in the Commonwealth Court—joined by other public interest law organizations—asked the Court in January to be flexible with its extension policy for the same concerns raised here, which is to ensure that Amici have sufficient time to obtain counsel and develop briefing on complex legal issues. This is particularly critical in cases involving matters of substantial public interest, such as the case at bar.

8. While the Court considers whether to make such policy changes, this case is one in which additional time will be critical to providing the Court with the type of quality and thoughtful briefing necessary to resolve the legal issues.
9. Accordingly, Appellees and Amici Curiae jointly request a one-week extension to file their briefs.
10. Granting an extension will not prejudice Appellants, and David Pittinsky, counsel for the Appellants, does not oppose the requested relief on the condition that this request will be the only request by for an extension from Appellees, the Juvenile Law Center, and Pennsylvanians for Modern Courts.

WHEREFORE, Appellees and Amici Curiae respectfully request that this Honorable Court grant their motion for a one-week extension of time until April 12, 2021.

Dated: March 23, 2021

Respectfully submitted,



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### **CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the Public Access Policy of the Unified 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.

### **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was served upon the parties via PACFile.

Dated: March 23, 2021

/s/ Steven Bizar  
Steven Bizar