

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

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

**APPELLANTS’ DESIGNATION  
OF CONTENTS OF REPRODUCED RECORD**

Appellants, Shameekah Moore, Martin Vickless, Kristin June Irwin and Kelly Williams, through undersigned counsel, hereby designate the following, pursuant to Pa.R.A.P. 2154(a) as the contents of the Reproduced Record in this appeal:

1. Docket Entries for *League of Women Voters of Pa. v. Boockvar*, No. 1016 MDA 2020 (Pa. Cmwlth.)
2. Petitioners’ Original Jurisdiction Petition for Review, filed October 10, 2019.

3. Application for Leave to Intervene of Shameekah Moore, Martin Vickless, Kristin June Irwin and Kelly Williams, filed October 17, 2019.
4. Application for Leave to Intervene of Ronald L. Greenblatt, filed October 18, 2019.
5. Order of the Commonwealth Court, entered October 22, 2019.
6. October 23, 2019 Hearing Transcript.
7. October 23, 2019 Hearing Exhibit P-1 (Ballot Question; Plain English Statement of the Office of Attorney General; Joint Resolution No. 2019-1).
8. Memorandum Opinion and Order of the Commonwealth Court (Ceisler, J.), filed October 30, 2019.
9. Order of the Supreme Court (*Per Curiam*), and Dissenting Statement (Saylor, C.J.), filed November 4, 2019, at Nos. 83-84 MAP 2019.
10. Respondent Party Intervenors' Answer and New Matter to Petition for Review, filed November 12, 2019.
11. Respondent's Answer and New Matter to Petition for Review, filed November 12, 2019.
12. Petitioners' Answer to Respondent's Answer and New Matter, filed November 18, 2019.
13. Petitioners' Answer to Respondent Party Intervenors' Answer and New Matter, filed November 18, 2019.

14. Petitioners' Application for Summary Relief and Entry of Judgment, filed December 13, 2019.

15. Respondent's Application for Summary Relief, filed December 13, 2019.

16. Respondent Party Intervenors' Application for Summary Relief, filed December 13, 2019.

17. Petitioners' Answer to Respondent's Application for Summary Relief, filed January 10, 2020.

18. Petitioners' Answer to Respondent Party Intervenors' Application for Summary Relief, filed January 10, 2020.

19. Respondent's Answer to Petitioners' Application for Summary Relief, filed January 13, 2020.

20. Cross reference note in the Record to the brief for the Order Announcing Judgment of the Court, Memorandum Opinion in Support of Order Announcing Judgment of the Court (Ceisler, J.), Memorandum Opinion in Support of Order Announcing Judgment of the Court (McCullough, J.) and Memorandum Opinion in Opposition to Order Announcing Judgment of the Court (Leavitt, P.J.), filed January 7, 2021.

Statement of Issues Intended to be Presented for Review:

- A. Whether the Commonwealth Court erred as a matter of law in declaring that the Proposed Amendment to Article I of the Pennsylvania Constitution, as set forth in Joint Resolution No. 2019-1, violated Article XI, Section 1 of the Pennsylvania Constitution, because the Proposed Amendment was contained in one ballot question?
  
- B. Whether the Proposed Amendment to Article I of the Pennsylvania Constitution, as set forth in Joint Resolution No. 2019-1, violated Article XI, Section 1 of the Pennsylvania Constitution, because the entire text of the Proposed Amendment did not appear verbatim in the one ballot question?
  
- C. Whether the Proposed Amendment to Article I of the Pennsylvania Constitution, as set forth in Joint Resolution No. 2019-1, failed to fairly, accurately and clearly apprise the electorate of the question to be voted upon?

Respectfully submitted,

Date: February 19, 2021

By: /s/ Scot R. Withers

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**PUBLIC ACCESS POLICY CERTIFICATE OF COMPLIANCE**

It is hereby certified by the undersigned 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.

Respectfully submitted,

Date: February 19, 2021

By: /s/ Scot R. Withers

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