## IN THE SUPREME COURT OF PENNSYLVANIA MIDDLE DISTRICT

## No. 159 MM 2017

LEAGUE OF WOMEN VOTERS OF PENNSYLVANIA, et al., Petitioners,

V.

THE COMMONWEALTH OF PENNSYLVANIA, et al., Respondents.

## MOTION OF AMICI CURIAE ADELE SCHNEIDER and STEPHEN WOLF SEEKING LEAVE OF COURT TO SUBMIT BRIEF IN SUPPORT OF PROPOSED REMEDIAL DISTRICTING PLANS

On the Recommended Findings of Fact and Conclusions of Law of the Commonwealth Court of Pennsylvania entered on 12/29/18 at No. 261 MD 2017

Adele Schneider 627 Greythorne Rd. Wynnewood, PA 19096 (610) 642-6571 adelesandras@gmail.com *Pro Se* 

Stephen Wolf 3225 NE Weidler St., No. 358 Portland, OR 97232 (336) 908-3225 swolf318@gmail.com *Pro Se*  Pursuant to Pa.R.A.P. 531(b)(1)(iii), amici Adele Schneider, a 40-year resident of Pennsylvania, and Stephen Wolf, a nationally recognized authority on redistricting, respectfully seek the Court's leave to submit a brief in support of two proposed congressional districting plans. Redistricting is an issue of paramount importance to the public, affecting all 12.8 million citizens of the commonwealth, and we believe that the cause of justice would be advanced if members of that public—who are independent of any party to this case or any Pennsylvania political organization—are given the opportunity to make their voices heard.

Courts in other similar redistricting cases have in recent years sought input from the public when considering remedies. *See, e.g., Favors v. Cuomo*, No. 11-cv-5632, Dkt. 223 at \*8 (E.D.N.Y March 12, 2012) (authorizing magistrate to consider remedial plans submitted by "interested members of the public"), *Personhuballah v. Alcorn*, No. 13-cv-678, Dkt. 207 at \*1 (E.D. Va. Sept. 3, 2015) (inviting "any non-parties desiring to do so" to "file their proposed remedial plans"), *Common Cause v. Rucho*, No. 16-cv-1026, Dkt. 118 at \*190 (M.D.N.C. Jan. 9, 2018) (inviting "other interested parties" to "submit an alternative remedial plan"). For these reasons, amici respectfully request that the Court grant leave to file the accompanying brief, with a word limit equal to what would be permitted for briefs filed under Pa.R.A.P. 531(b)(1)(i).

Dated: Feb. 15, 2018

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Adele Schneider 627 Greythorne Rd. Wynnewood, PA 19096 (610) 642-6571 adelesandras@gmail.com *Pro Se*  Stephen Wolf 3225 NE Weidler St., No. 358 Portland, OR 97232 (336) 908-3225 swolf318@gmail.com *Pro Se*