

**IN THE SUPREME COURT OF PENNSYLVANIA**

---

**55 MAP 2020**

---

**IN RE NOMINATION PAPER OF ELZABETH  
SCROGGINS, ET AL**

---

**APPELLEE RESPONSE TO APPLICATION FOR STAY  
ANCILLARY TO APPEAL AND EXPEDITED  
CONSIDERATION AND OTHER RELIEF**

---

**LAWRENCE M. OTTER**

**PA ID NO 31383**

**ATTORNEY AT LAW**

**PO BOX 575**

**SILVERDALE, PA 18962**

**267-261-2948**

**EMAIL: [larryotter@hotmail.com](mailto:larryotter@hotmail.com)**

**Counsel for Appellee,  
Howie Hawkins, candidate for  
President of the United States**

Howie Hawkins, Appellee, by and through his counsel,  
Lawrence M. Otter, Esquire replies to Appellants Request for  
A Stay and other relief and says:

1. Both lead counsel for the parties are very experienced election lawyers and are familiar with the expeditious nature of appeals to the Pennsylvania Supreme Court in election matters.
2. Appellee Counsel will file his Brief on Monday September 14, 2020 on or before 3:00 in the afternoon pursuant to the September 10, 2020 Briefing Schedule ordered by this Court at 1;00 PM.
3. With all due respect to learned counsel for Appellants, the application for a Stay of the Commonwealth Court Order of September 9, 2020 is unnecessary as the briefing schedule

issued by this Court closes the pleadings on September 15, 2020.

4. Based upon my prior Supreme Court experience in election matters, I fully expect an expeditious handling of the case by this Court and a ruling on the merits shortly given the need to print ballots by all 67 counties in the Commonwealth during the week of September 14, 2020.
5. Contrary to Objectors Application for a Stay, they cannot make out a strong showing that they are likely to succeed given the fact that they lost in the court below.
6. This Court has already expedited the briefing schedule
7. Appellee Counsel will file his Brief on Monday September 14 pursuant to the Order of Sept 10, 2020.

WHEREFORE, Appellee requests that the Application for Stay be DENIED. The other request for expedited briefing

is now MOOT given the Order of September 10, 2020.

Respectfully submitted,

**/s/ Lawrence M. Otter, Esq.**

---

LAWRENCE M. OTTER

ATTORNEY AT LAW

P O BOX 575

SILVERDALE, PA 18962

267-261-2948

Email: [larryotter@hotmail.com](mailto:larryotter@hotmail.com)