

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

In re: the Petition of LAW STUDENTS
FOR EQUITABLE RESPONSES TO
COVID-19 by Ryan Aloysius Smith and
Pretty Martinez, Trustees ad Litem;
ROBERT SUITE, MARY BETH KUZNIK,
BRANDON VANTINE, ROBERT GAVIN,
CHRISTIAN WOLGEMUTH, JESSICA
MCDERMOTT, RAVEN MOORE,
DEREK DEMERI, CATHERINE CUFF,
MICHELLE TABACH, KARLA
PISARCIK, CAROLINE ROBELEN, and
KARLI STUDY,

Petitioners.

No. 74 WM 2020

**APPLICATION FOR LEAVE TO FILE REPLY BRIEF IN SUPPORT OF
PETITIONERS' PETITION FOR REVIEW**

Petitioners, Law Students for Equitable Responses to COVID-19 *et al.*, by and through their *pro bono* attorneys, Louis M. Natali, Jr., and Michael J. Engle, hereby move this Honorable Court for an Order granting Petitioners leave to file a Reply Brief and in support thereof aver and submit the following:

1. A reply from Petitioners to the Answer submitted by Pennsylvania Board of Law Examiners (the "Board") is necessary to address the Board's mischaracterizations of Petitioners' arguments and requested form of relief.
2. This Court's "exercise of King's Bench authority is not limited by prescribed forms of procedure . . . ; the Court may employ any type of process or

procedure necessary for the circumstances.” *Wolf v. Scarnati*, 2020 Pa. LEXIS 3603, at *7 n.8 (quoting *In re Bruno*, 101 A.3d 635, 669 (Pa. 2014)).

3. A short reply brief from Petitioners is necessary because Petitioners would otherwise have no opportunity to address respondent’s mischaracterizations of their arguments and requested form of relief in the Petition for Review.

4. A reply from Petitioners is also necessary to preserve judicial integrity and transparency, given that the Board has made these mischaracterizations while acting under the authority vested to it by this Court under Pennsylvania Bar Admission Rule 104. *See Appeal of Murphy*, 393 A.2d 369, 371 (Pa. 1978) (“The admission of a person to practice law in this state is and always has been a judicial function, exercised now exclusively by the Supreme Court, with the aid of the State Board of Law Examiners.”).

5. Petitioners submit that they have acted promptly and diligently in immediately seeking leave to file a reply, and will, upon the granting of this application, promptly file the Reply Brief, which is attached hereto as “Exhibit A”.

WHEREFORE, Petitioners, Law Students for Equitable Responses to COVID-19 *et al.*, respectfully request that the Application for Leave to File Reply Brief be granted and that Petitioners be permitted to submit their Reply Brief to this Honorable Court for its consideration.

Respectfully submitted:

/s/ Louis M. Natali

Louis M. Natali, Jr., Esquire
Attorney I.D. # 03114
Professor of Law Emeritus
Temple University Law School
(215) 204-8977
louis.natali@temple.edu

/s/ Michael J. Engle

Michael J. Engle, Esquire
Attorney I.D. # 85576
Buchanan Ingersoll & Rooney, P.C.
Two Liberty Place
50 S. 16th Street, Suite 3200
Philadelphia, PA 19103
(215) 665-3843
michael.engle@bipc.com

Pro Bono Counsel for the Petitioners