

*HANGLEY ARONCHICK SEGAL PUDLIN &  
SCHILLER*

Michele D. Hangley (I.D. No. 82779)  
Robert A. Wiygul (I.D. No. 310760)  
Christina C. Matthias (I.D. No. 326864)  
One Logan Square, 27th Floor  
Philadelphia, PA 19103-6933  
(215) 568-6200  
(215) 568-0300 (facsimile)

*TUCKER LAW GROUP*

Joe H. Tucker (I.D. No. 56617)  
Dimitrios Mavroudis (I.D. No.  
93773)  
1801 Market Street, Suite 2500  
Philadelphia, PA 19103  
(215) 875-0609

*Counsel for Respondent, Kathy  
Boockvar, in her official capacity as  
Secretary of the Commonwealth*

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

---

NATIONAL ELECTIONS DEFENSE  
COALITION, *et al.*,

Petitioners,

v.

KATHY BOOCKVAR, in her official capacity  
as Secretary of the Commonwealth,

Respondent.

---

:  
:  
: CIVIL ACTION  
:  
:  
: No. 674 MD 2019  
:  
:  
:  
:  
:  
:  
:  
:

**NOTICE OF PROCEDURAL DEVELOPMENT REGARDING RESPONDENT’S  
APPLICATION TO STAY PRELIMINARY INJUNCTION PROCEEDINGS PENDING  
RESOLUTION OF PRELIMINARY OBJECTIONS AND PARALLEL FEDERAL  
COURT MOTION**

On January 16, 2020, Respondent filed an Application to Stay the preliminary injunction proceedings in this matter pending the outcome of, *inter alia*, a hearing in federal court scheduled for January 21, 2020. Shortly after Respondent filed the Application, U.S. District Court Judge Paul S. Diamond, in a telephone conference with the parties in the related federal

court case (*Stein v. Boockvar*, No. 2:16-cv-06287, E.D. Pa.), stated that he was postponing the hearing from January 21 until February 18, 2020. Respondent expects that Judge Diamond will issue a written order shortly. Although the date of the federal court hearing has changed, the reasons to grant Respondent's Application remain equally compelling. The federal court motion will likely be resolved in short order, and Respondent's Preliminary Objections could dramatically change the scope of the issues at stake.

**WHEREFORE**, for the reasons stated above and in Respondent's Application and brief, Respondent respectfully asks the Court to stay the current deadline for a response to Petitioners' Application, and to postpone the Preliminary Injunction hearing, until decisions have issued in the federal court matter and on the Preliminary Objections.

Respectfully,

**HANGLEY ARONCHICK SEGAL PUDLIN &  
SCHILLER**

Dated: January 16, 2020

By:           /s/ Michele D. Hangley            
Michele D. Hangley (I.D. No. 82779)  
Robert A. Wiygul (I.D. No. 310760)  
Christina C. Matthias (I.D. No. 326864)  
One Logan Square, 27th Floor  
Philadelphia, PA 19103-6933  
(215) 568-6200  
(215) 568-0300 (facsimile)

**TUCKER LAW GROUP**

Joe H. Tucker (I.D. No. 56617)  
Dimitrios Mavroudis (I.D. No. 93773)  
1801 Market Street, Suite 2500  
Philadelphia, PA 19103  
(215) 875-0609

*Counsel for Respondent, Kathy Boockvar, in her official  
capacity as Secretary of the Commonwealth*

**CERTIFICATION REGARDING PUBLIC ACCESS POLICY**

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.

Dated: January 16, 2020

/s/ Michele D. Hangle  
Michele D. Hangle