

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

_____ CD 2020

DARYL D. METCALFE, RUSS DIAMOND, DAWN W. KEEFER,
THOMAS R. SANKEY, III, ROBERT W. KAUFFMAN, KATHY
L. RAPP, STEPHANIE P. BOROWICZ, JAMES MOLLICK,
FRANK SCAVO, CRIS E. DUSH, FRANCIS X. RYAN

Plaintiffs,

vs.

THOMAS W. WOLF, in his official capacity as Governor of the Commonwealth
Pennsylvania, KATHY BOOCKVAR, in her official capacity as Secretary of the
Commonwealth of Pennsylvania, and, all in their capacity as Democratic
presidential electors, Nina Ahmad, Val Arkoosh, Cindy Bass, Rick Bloomingdale,
Ryan Boyer, Paige Gebhardt Cognetti, Daisy Cruz, Kathy Dahlkemper, Janet Diaz,
Virginia McGregor, Charles Hadley, Jordan Harris, Malcolm Kenyatta, Gerald
Lawrence, Clifford Levine, Nancy Mills, Marian Moskowitz, Josh Shapiro, Sharif
Street, Connie Williams,

Defendants.

**EMERGENCY MOTION FOR A TEMPORARY
RESTRAINING ORDER AND INJUNCTIVE RELIEF**

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DAWN W. KEEFER, THOMAS R.)
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KATHY L. RAPP, STEPHANIE P.)
BOROWICZ, JAMES MOLLICK, FRANK)
SCAVO, CRIS E. DUSH, FRANCIS X. RYAN,)

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Plaintiffs,)

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THOMAS W. WOLF, in his official)
capacity as Governor of the Commonwealth)
Pennsylvania, KATHY BOOCKVAR,)
in her official capacity as Secretary of the)
Commonwealth of Pennsylvania, and, all in their)
capacity as Democratic presidential electors,)
Nina Ahmad, Val Arkoosh, Cindy Bass, Rick)
Bloomingdale, Ryan Boyer, Paige Gebhardt)
Cognetti, Daisy Cruz, Kathy Dahlkemper, Janet)
Diaz, Virginia McGregor, Charles Hadley, Jordan)
Harris, Malcolm Kenyatta, Gerald Lawrence,)
Clifford Levine, Nancy Mills, Marian Moskowitz,)
Josh Shapiro, Sharif Street, and Connie Williams,)

Defendants.)

**EMERGENCY MOTION FOR TEMPORARY
RESTRAINING ORDER AND INJUNCTIVE RELIEF**

AND NOW, comes Plaintiffs, by and through their attorneys, Dillon McCandless King Coulter & Graham, LLP, per Thomas W. King, III, Esquire, and Thomas E. Breth, Esquire, to file the within Emergency Motion for Temporary Restraining Order and Injunctive Relief and respectfully requests that this Court grant the within Motion for the reasons set forth in Plaintiffs' Complaint for Writ of

Mandamus and Request for an Emergency Temporary Restraining Order and Injunctive Relief which is incorporated herein by reference as if fully set forth.

Respectfully Submitted,

**DILLON, McCANDLESS, KING,
COULTER & GRAHAM, LLP**

Dated: December 4, 2020

By: /s/ Thomas W. King, III
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Harris, Malcolm Kenyatta, Gerald Lawrence,)
Clifford Levine, Nancy Mills, Marian Moskowitz,)
Josh Shapiro, Sharif Street, and Connie Williams,)

Defendants.

ORDER OF COURT

AND NOW, this ___ day of December 2020, the within Emergency Motion
for Temporary Restraining Order and Injunction Relief is hereby GRANTED.

BY THE COURT,

Judge