

LAMB McERLANE PC

By: Joel L. Frank

Attorney I.D. # 46601

By: Scot R. Withers

Attorney I.D. # 84309

By: William R. Christman III

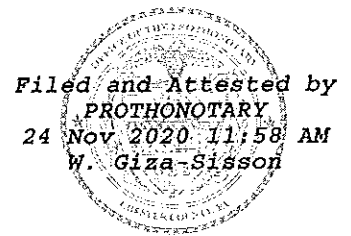
Attorney I.D. # 318827

24 East Market Street - Box 565

West Chester, Pennsylvania 19381-0565

(610) 430-8000

Counsel for Petitioners



**IN THE COURT OF COMMON PLEAS
OF CHESTER COUNTY, PENNSYLVANIA**

In re Contest of November 3, 2020 Election	:	No. 2020-08732-MJ
of State Senator in the 9 th Senatorial District	:	
of Pennsylvania	:	ELECTION MATTER
	:	
Petition of: Ruth Moton, Carla Stevenson,	:	
Irma Jenkins, Waymond Thompson, Helen	:	
Bowman, Nancy Bowden, Josephine Laird,	:	
Kim Gehrke, David Sommers, Sallie Yoder,	:	
John Mctear, William McCarter, Charlie	:	
Moton, Kathleen Dobson, John Kelley,	:	
Thomas Danzi, Debra Danzi, Randy Bates,	:	
Anne Bates, Lindsey Conan, Eric Miller,	:	
Janine Miller, Gary Urban, Amber Bennett,	:	
James Cassidy, Karen Cassidy, Thomas	:	
Foster, Marshall Lerner, Catherine Burkett	:	
and Christopher Burkett	:	

AFFIDAVIT OF SERVICE

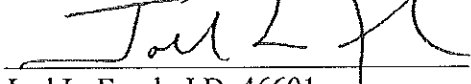
I, Joel L. Frank, Esquire, of Lamb McErlane, PC, hereby submit this Affidavit of Service demonstrating that Respondent John I. Kane and Nominal Respondents Delaware County Board of Elections and Delaware County Voter Registration Commission were served by Pennsylvania State Constable David Cox in person with the Petition for Election Contest, in accordance with the notarized Returns of Service which are attached hereto and marked as Exhibit "A".

Respectfully submitted,

Date: 11/24/2020

By:

LAMB MCERLANE PC



Joel L. Frank, I.D. 46601

Scot R. Withers, I.D. 84309

William R. Christman III, I.D. 318827

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jfrank@lambmcerlane.com

swithers@lambmcerlane.com

bchristman@lambmcerlane.com

PUBLIC ACCESS POLICY CERTIFICATE OF COMPLIANCE

I hereby 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.

Date: 11/24/2020

By:

LAMB MCERLANE PC

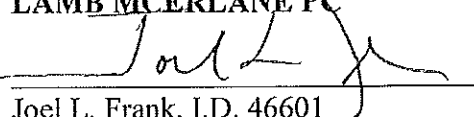

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EXHIBIT “A”

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OF CHESTER COUNTY, PENNSYLVANIA**

In re Contest of November 3, 2020 Election : No. 2020-08732-MJ
of State Senator in the 9th Senatorial District :
of Pennsylvania : ELECTION MATTER
:

Petition of: Ruth Moton, Carla Stevenson, :
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Kim Gehrke, David Sommers, Sallie Yoder, :
John McTeer, William McCarter, Charlie :
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Thomas Danzi, Debra Danzi, Randy Bates, :
Anne Bates, Lindsey Conan, Eric Miller, :
Janine Miller, Gary Urban, Amber Bennett, :
James Cassidy, Karen Cassidy, Thomas :
Foster, Marshall Lerner, Catherine Burkett :
and Christopher Burkett :

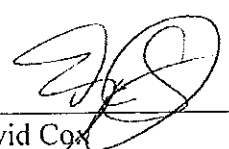
RETURN OF SERVICE

COMMONWEALTH OF PENNSYLVANIA :
: SS
COUNTY OF CHESTER :

David Cox, being duly sworn according to law, deposes and says that he is a duly certified Constable in and for the Commonwealth of Pennsylvania and that on November 23, 2020, at approximately 5:50 P.M., he did personally serve a copy of the Petition for Election Contest by handing said documents to LORI KANE (WIFE), at the residence of Respondent John I. Kane, 1109 Radley Drive, West Chester, Pennsylvania 19382.

Sworn to and subscribed
before me this 24th
day of November, 2020

Notary Public


David Cox

Commonwealth of Pennsylvania - Notary Seal
MICHELE L MEEKINS - Notary Public
Chester County
My Commission Expires Sep 26, 2022
Commission Number 1251178

2020-08732-MJ

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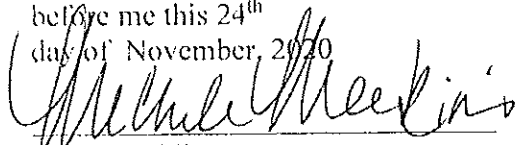
Petition of: Ruth Moton, Carla Stevenson, :
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Anne Bates, Lindsey Conan, Eric Miller, :
Janine Miller, Gary Urban, Amber Bennett, :
James Cassidy, Karen Cassidy, Thomas :
Foster, Marshall Lerner, Catherine Burkett :
and Christopher Burkett :

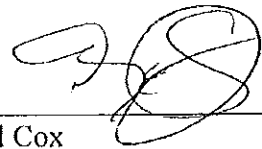
RETURN OF SERVICE

COMMONWEALTH OF PENNSYLVANIA :
: SS
COUNTY OF CHESTER :

David Cox, being duly sworn according to law, deposes and says that he is a duly certified Constable in and for the Commonwealth of Pennsylvania and that on November 23, 2020, at approximately 2:55 P.M., he did personally serve a copy of the Petition for Election Contest by handing said documents to MICHELLE DINARDIS, at the Delaware County Voter Registration Commission, 201 West Front Street, Media, PA 19063.

Sworn to and subscribed
before me this 24th
day of November, 2020


Notary Public


David Cox

Commonwealth of Pennsylvania - Notary Seal
MICHELE L. MEEKINS - Notary Public
Chester County
My Commission Expires Sep 26, 2022
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2020-08732-MJ

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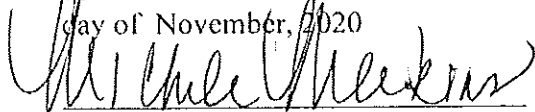
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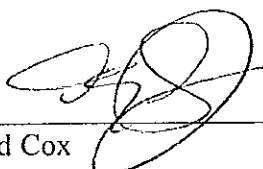
RETURN OF SERVICE

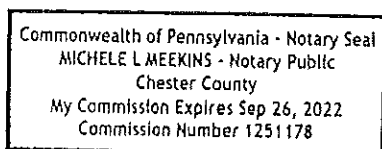
COMMONWEALTH OF PENNSYLVANIA :
: SS
COUNTY OF CHESTER :

David Cox, being duly sworn according to law, deposes and says that he is a duly certified Constable in and for the Commonwealth of Pennsylvania and that on November 23, 2020, at approximately 3:15 P.M., he did personally serve a copy of the Petition for Election Contest by handing said documents to ASHLEY LUNKENHEIMER, at the Delaware County Board of Elections, 201 West Front Street, Media, PA 19063.

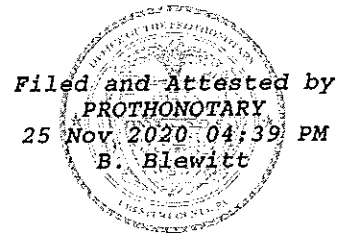
Sworn to and subscribed
Before me this 24th
day of November, 2020


Notary Public


David Cox



**IN THE COURT OF COMMON PLEAS
FOR CHESTER COUNTY, PENNSYLVANIA**



In re Contest of November 3, 2020 Election
of State Senator in the 9th Senatorial District
of Pennsylvania

No. 2020-08732-MJ

Petition of: Ruth Moton, Carla Stevenson,
Irma Jenkins, Waymond Thompson, Helen
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Jon Mctear, William McCarter, Charlie Mo-
ton, Kathleen Dobson, John Kelley, Thomas
Danzi, Debra Danzi, Randy Bates, Anne
Bates, Lindsey Conan, Eric Miller, Janine
Miller, Gary Urban, Amber Bennett, James
Cassidy, Karen Cassidy, Thomas Foster,
Marshall Lerner, Catherine Burkett and
Christopher Burkett

PRAECIPE FOR ENTRY OF APPEARANCE

TO THE OFFICE OF JUDICIAL SUPPORT:

Kindly enter my appearance on behalf of Senator-Elect John I. Kane in this action.

Respectfully submitted,

Dated: November 25, 2020

GREENBERG TRAUIG, LLP

s/ George J. Farrell

Kevin M. Greenberg (Pa. I.D. No. 82311)

George J. Farrell (Pa. I.D. No. 324521)

1717 Arch Street, Suite 400

Philadelphia, PA 19103

(t) 215.988.7818 (f) 215.988.7801

greenbergk@gtlaw.com

farrellg@gtlaw.com

Adam C. Bonin (Pa. I.D. No. 80929)

The Law Offices of Adam C. Bonin

The North American Building

121 South Broad St., Suite 400

Philadelphia, PA 19107

adam@boninlaw.com

Attorneys for Senator-Elect John I. Kane

Nicole R. Forzato, Esquire
Chester County Solicitor
313 W. Market St.
Suite 6702
West Chester, PA 19380-0991

s/ George J. Farrell

George J. Farrell (Pa. I.D. No. 324521)

Attorneys for Senator-Elect John I. Kane

\$500

LAMB McERLANE PC

By: Joel L. Frank
Attorney I.D. # 46601
By: Scot R. Withers
Attorney I.D. # 84309
By: William R. Christman III
Attorney I.D. # 318827
24 East Market Street - Box 565
West Chester, Pennsylvania 19381-0565
(610) 430-8000
Counsel for Petitioners

**IN THE COURT OF COMMON PLEAS
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Janine Miller, Gary Urban, Amber Bennett, :
James Cassidy, Karen Cassidy, Thomas :
Foster, Marshall Lerner, Catherine Burkett :
and Christopher Burkett :

PRAECIPE TO DEPOSIT CASH BOND

TO THE PROTHONOTARY:

Kindly deposit the enclosed funds, totaling \$500, as a cash bond per the attached Order.

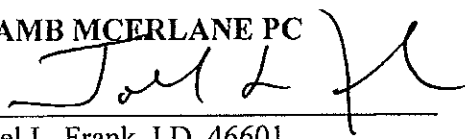


Respectfully submitted,

LAMB MCERLANE PC

Date. 11/30/2020

By:


Joel L. Frank, I.D. 46601

Scot R. Withers, I.D. 84309

William R. Christman III, I.D. 318827

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swithers@lambmcerlane.com

bchristman@lambmcerlane.com

IN THE COURT OF COMMON PLEAS
OF CHESTER COUNTY, PENNSYLVANIA

In re Contest of November 3, 2020 Election
of State Senator in the 9th Senatorial District
of Pennsylvania

No. 2020-08732
ELECTION MATTER

ORDER

AND NOW, this 23 day of Nov., 2020, upon review of the
Petition for Election Contest filed in the above-captioned matter and the exhibits attached
thereto, Petitioners shall, on or before November 30, 2020, post a bond in the amount of
\$ 500.00 ^(five hundred dollars total) signed by at least five of the said petitioners, conditioned for the payment
of all costs which may accrue in said contested election proceeding.

BY THE COURT:

M. J. Innell
J.

AN
FILED NOV 23 2020

LAMB McERLANE PC

By: Joel L. Frank

Attorney I.D. # 46601

By: Scot R. Withers

Attorney I.D. # 84309

By: William R. Christman III

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Janine Miller, Gary Urban, Amber Bennett, :
James Cassidy, Karen Cassidy, Thomas :
Foster, Marshall Lerner, Catherine Burkett :
and Christopher Burkett :

CERTIFICATE OF SERVICE

This is to certify that in this case, a copy of the foregoing Praecipe to Deposit Cash Bond was serviced on the following persons, by the following means and on the date stated below:

In re Contest of November 3, 2020 Election
of State Senator in the 9th Senatorial District
of Pennsylvania

No. 2020-08732-MJ

Petition of: Ruth Moton, Carla Stevenson, Irma Jenkins, Waymond Thompson, Helen Bowman, Nancy Bowden, Josephine Laird, Kim Gehrke, David Sommers, Sallie Yoder, Jon Mctear, William McCarter, Charlie Moton, Kathleen Dobson, John Kelley, Thomas Danzi, Debra Danzi, Randy Bates, Anne Bates, Lindsey Conan, Eric Miller, Janine Miller, Gary Urban, Amber Bennett, James Cassidy, Karen Cassidy, Thomas Foster, Marshall Lerner, Catherine Burkett and Christopher Burkett

I, George J. Farrell, certify that on November 25, 2020, I caused a true and correct copy of the foregoing Entry of Appearance to be served on the following:

Joel L. Frank, Esquire
Scot R. Withers, Esquire
William R. Christman III, Esquire
Lamb McErlane PC
24 East Market Street
P.O. Box 565
West Chester, PA 19381-0565

William F. Martin, Esquire
Delaware County Solicitor
Government Center, 2nd Fl.
201 W. Front St.
Media, PA 19063

Name:

John I. Kane
1109 Radley Drive
West Chester, PA 19382

Means of Service:

First Class Mail

Date of Service:


November 30, 2020

Respectfully submitted,

LAMB MCERLANE PC

Date 11/30/2020

By:


Joel L. Frank, I.D. 46601
Scot R. Withers, I.D. 84309
William R. Christman III, I.D. 318827
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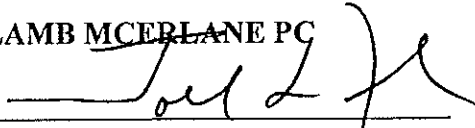
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I hereby certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Date: 11/30/2020

By:

LAMB MCEERLANE PC


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