

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

CAROL ANN CARTER; MONICA
PARRILLA; REBECCA
POYOUROWN; WILLIAM TUNG;
ROSEANNE MILAZZO; BURT
SIEGEL; SUSAN CASSANELLI;
LEE CASSANELLI; LYNN
WACHMAN; MICHAEL
GUTTMAN; MAYA FONKEU;
BRADY HILL; MARY ELLEN
BALCHUNIS; TOM DEWALL;
STEPHANIE MCNULTY; and JANET
TEMIN,

Petitioners,

v.

CASES CONSOLIDATED

No. 464 M.D. 2021

VERONICA DEGRAFFENREID, in
her official capacity as the Acting
Secretary of the Commonwealth of
Pennsylvania; JESSICA MATHIS, in
her official capacity for the
Pennsylvania Bureau of Election
Services and Notaries,

Respondents.

PHILIP T. GRESSMAN; RON Y.
DONAGI; KRISTOPHER R. TAPP;
PAMELA GORKIN; DAVID P.
MARSH; JAMES L.
ROSENBERGER; AMY MYERS;
EUGENE BOMAN; GARY

GORDON; LIZ MCMAHON,
TIMOTHY G. FEEMAN; and GARTH
ISAAK,

Petitioners,

v.

No. 465 M.D. 2021

VERONICA DEGRAFFENREID, in
her official capacity as the Acting
Secretary of the Commonwealth of
Pennsylvania; JESSICA MATHIS, in
her official capacity as Director for the
Pennsylvania Bureau of Election
Services and Notaries,

Respondents.

STIPULATION OF FACTS

The Carter Petitioners and Proposed Intervenor Joanna E. McClinton do hereby stipulate and agree to the following for purposes of the intervention hearing in the above-captioned matters to be held on January 6, 2022, with the understanding that the Carter Petitioners expressly reserve the right to contest these facts at a future time:

1. Proposed Intervenor Joanna E. McClinton is a duly elected member of the Pennsylvania House of Representatives representing the 191st Legislative District, including Philadelphia and Delaware counties.

2. Proposed Intervenor Joanna E. McClinton has served as a Member of the Pennsylvania House of Representatives beginning in 2015.

3. Proposed Intervenor Joanna E. McClinton currently serves as the Democratic Leader of the Pennsylvania House of Representatives for the 2021-2022 Legislative Session.



Michael R. McDonald
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Counsel for Carter Petitioners

Respectfully submitted,

/s/ Matthew S. Salkowski

Matthew S. Salkowski
Pa. No. 320439
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Joanna E. McClinton*