

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Carol Ann Carter; Monica Parrilla;	:	CASES CONSOLIDATED
Rebecca Poyourow; William Tung;	:	
Roseanne Milazzo; Burt Siegel;	:	No. 464 M.D. 2021
Susan Cassanelli; Lee Cassanelli;	:	No. 465 M.D. 2021
Lynn Wachman; Michael Guttman;	:	
Maya Fonkeu; Brady Hill; Mary	:	
Ellen Balchunis; Tom DeWall,	:	
Stephanie McNulty and Janet	:	
Temin,	:	

Petitioners,

v.

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,

Phillip 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.
Freeman; and Garth Isaak,

Petitioners,

v.

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,

Leslie Osche, Kim Geyer, Michael
T. Slupe, Candee Barnes, Thomas
Reep, Brandy Reep, Kenneth
Lunsford, Tammy Lunsford, James
Thompson, Pamela Thompson,
Joseph Renwick, Stephanie
Renwick, Louis Capozzi, David
Ball, Mary E. Owlett, Kristine Eng,
Justin Behrens, James P.
Foreman, Matthew J. Stuckey,
Anthony J. Luther, Linda C.
Daniels, Jeffrey Piccola, James
Vasilko, Jay Hagerman, and Evan
P. Smith,

Proposed Intervenors-Petitioners,

v.

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

Solely for purposes of the intervention hearing in the above matter to be held on January 6, 2022 (the Carter Petitioners expressly reserve the right to contest these facts at a future time), the Carter Petitioners and the Proposed Citizen- Voter Intervenors do hereby stipulate and agree as follows:

1. Exhibit P-8 and Exhibit Citizen Voter Intervenors – 3 are true and correct copies of a December 28, 2021 letter from the Office of the Governor of the Commonwealth of Pennsylvania to the Speaker and Majority Leader of the Pennsylvania House of Representatives, available at <https://www.governor.pa.gov/wp-content/uploads/2021/12/12.28.21-TWW-Cutler-Benninghoff-HB-2146-Final.pdf>.

2. Exhibit Citizen Voter Intervenors – 4 is a true and correct copy of the Pennsylvania Redistricting Advisory Council’s Redistricting Principles, available at <https://www.governor.pa.gov/wp-content/uploads/2021/11/Redistricting-Advisory-Council-Final-Principles.pdf>.

3. Leslie Osche (“Ms. Osche”) is a voter and a county commissioner in Butler County, Pennsylvania in Pennsylvania’s 15th Congressional District.

4. Kim Geyer (“Ms. Geyer”) is a voter and a county commissioner in Butler County, Pennsylvania.

5. Michael T. Slupe (“Sheriff Slupe”) is a voter and the Sheriff of Butler County, Pennsylvania in Pennsylvania’s 15th Congressional District.

6. Candee Barnes (“Ms. Barnes”) resides in and is a voter in Summit Township, Butler County, Pennsylvania.

7. Thomas Reep (“Mr. Reep”) resides in and is a voter in Summit Township, Butler County, Pennsylvania.

8. Brandy Reep (“Mrs. Reep”) resides in and is a voter in Summit Township, Butler County, Pennsylvania.

9. Kenneth Lunsford (“Mr. Lunsford”) resides in and is a voter in Summit Township, Butler County, Pennsylvania.

10. Tammy Lunsford (“Mrs. Lunsford”) resides in and is a voter in Summit Township, Butler County, Pennsylvania.

11. James Thompson (Mr. Thompson”) resides in and is a voter in Summit Township, Butler County, Pennsylvania.

12. Pamela Thompson (“Mrs. Thompson”) resides in and is a voter in Summit Township, Butler County, Pennsylvania.

13. Joseph Renwick (“Mr. Renwick”) resides in and is a voter in Summit Township, Butler County, Pennsylvania.

14. Stephanie Renwick (“Mrs. Renwick”) resides in and is a voter in Summit Township, Butler County, Pennsylvania.

15. Louis Capozzi (“Mr. Capozzi”) resides in and is a voter in Cumberland County, Pennsylvania.

16. David Ball (“Mr. Ball”) resides in and is a voter in Washington County, Pennsylvania.

17. Mary E. Owlett (“Ms. Owlett”) resides in and is a voter in Tioga County, Pennsylvania.

18. Kristine Eng (“Ms. Eng”) resides in and is a voter in Centre County, Pennsylvania.

19. Justin Behrens (“Mr. Behrens”) resides in and is a voter in Luzerne County, Pennsylvania.

20. James P. Foreman (“Mr. Foreman”) resides in and is a voter in Blair County, Pennsylvania.

21. Matthew J. Stuckey (“Mr. Stuckey”) resides in and is a voter in Blair County, Pennsylvania.

22. Anthony J. Luther (“Mr. Luther”) resides in and is a voter in Blair County, Pennsylvania.

23. Linda C. Daniels (“Ms. Daniels”) resides in and is a voter in Blair County, Pennsylvania.

24. Jeffrey Piccola (“Mr. Piccola”) resides in and is a voter in York County, Pennsylvania.

25. James Vasilko (“Mr. Vasilko”) resides in and is a voter in Cambria County, Pennsylvania.

26. Jay Hagerman (“Mr. Hagerman”) resides in and is a voter in Allegheny County, Pennsylvania.

27. Evan P. Smith (“Mr. Smith”) resides in and is a voter in Allegheny County, Pennsylvania.

28. Petitioners in this matter, Carol Ann Carter, Monica Parrilla, Rebecca Poyourow, 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 (the “Carter Petitioners”) previously filed a Petition for Review in April 2021 (the “*Carter / Petition*”).

29. Exhibit P-6 is a true and correct copy of the Carter Petitioners’ *Carter / Petition*.

30. Proposed Intervenor Louis Capozzi, James P. Forman, Justin Behrens, Kristine Eng, David Ball, and James Vasilko, a subset of the Proposed Citizen-Voter Intervenor, applied to intervene in the *Carter /* litigation in June 2021.

31. Exhibit P-4 is a true and correct copy of Louis Capozzi, James P. Forman, Justin Behrens, Kristine Eng, David Ball, and James Vasilko's June 2021 Application to Intervene in *Carter I.*

SO STIPULATED:

**On behalf of Proposed
Citizen Voter Intervenors**

**On behalf of the Carter
Petitioners**

**Dillon, McCandless, King,
Coulter & Graham L.L.P.**

Ballard Spahr

/s/ Thomas W. King, III
Thomas W. King III, Esq.
PA. ID No. 21580

/s/ Michael R. McDonald
Michael R. McDonald, Esq.
PA. ID No. 326873

Dated: January 5, 2022.