

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

No. 464 MD 2021

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 Bachunis; Tom DeWall; Stephanie McNulty; and Janet Temin,

Petitioners,

v.

Veronica Degraffenreid, in Her Capacity as Acting Secretary of the Commonwealth of Pennsylvania; and Jessica Matthis, in Her Acting Capacity as Director of the Bureau of Election Services and Notaries,

Respondents.

No. 465 MD 2021

Philip T. Gressman; Ron Y. Donagi; Kristopher R. Tapp; Pamela A. Gorkin; David P. Marsh; James L. Rosenberger; Amy Myers; Eugene Boman; Gary Gordon; Liz McMahon; Timothy G. Feeman; and Garth Isaak,

Petitioners,

v.

Veronica Degraffenreid, in Her Capacity as Acting Secretary of the Commonwealth of Pennsylvania; and Jessica Matthis, in Her Acting Capacity as Director of the Bureau of Election Services and Notaries,

Respondents.

**VOTERS OF THE COMMONWEALTH OF PENNSYLVANIA’S
WITNESS LIST AND EXHIBIT LIST REGARDING THEIR
APPLICATION FOR LEAVE TO INTERVENE**

Pursuant to the Court’s order of January 4, 2021, Haroon Bashir, Valerie Biancaniello, Tegwyn Hughes, and Jeffrey Wenk (collectively, the “Proposed Voter Intervenors”) hereby file this Witness List and Exhibit List in support of their Application for Leave to Intervene in this consolidated action:

I. WITNESS LIST

1. **Haroon Bashir** will testify regarding his residency and registration to vote in Pennsylvania, his intent to advocate and vote for Republican candidates in the upcoming 2022 primary and general elections, his personal and individual interest in submitting a congressional redistricting plan of his choosing, the inadequate representation of his interests by the current parties, the lack of other opportunities to provide input into a judicially adopted congressional districting plan (in contrast with such a plan enacted through the legislative process), and his willingness and ability to abide by the Court’s schedule to ensure that his intervention will not cause any unnecessary delay in the case.

2. **Tegwyn Hughes** will testify regarding her residency and registration to vote in Pennsylvania, her intent to advocate and vote for Republican candidates in the upcoming 2022 primary and general elections, her personal and individual interest in submitting a congressional redistricting plan of her choosing, the

inadequate representation of his interests by the current parties, the lack of other opportunities to provide input into a judicially adopted congressional districting plan (in contrast with such a plan enacted through the legislative process), and her willingness and ability to abide by the Court's schedule to ensure that her intervention will not cause any unnecessary delay in the case.

3. **Jeffrey Wenk** will testify regarding his residency and registration to vote in Pennsylvania, his intent to advocate and vote for Republican candidates in the upcoming 2022 primary and general elections, his personal and individual interest in submitting a congressional redistricting plan of his choosing, the inadequate representation of his interests by the current parties, the lack of other opportunities to provide input into a judicially adopted congressional districting plan (in contrast with such a plan enacted through the legislative process), and his willingness and ability to abide by the Court's schedule to ensure that his intervention will not cause any unnecessary delay in the case.

II. EXHIBIT LIST

Voter-1. Petition for Review filed by Carter Petitioners at *Carter, et al. v. Degraffenreid*, 132 MD 2021.

Voter-2. Declaration of Valerie Biancaniello.

III. RESERVATION OF RIGHTS

1. The Proposed Voter Intervenors reserve the right to call additional witnesses or use additional exhibits via rebuttal.
2. The Proposed Voter Intervenors reserve the right to call any witness identified on any other party's witness list.
3. The Proposed Voter Intervenors reserve the right to use any exhibit disclosed in any other party's exhibit list.
4. The Proposed Voter Intervenors reserve the right to amend or supplement this Witness List and Exhibit List up to and through the time of the hearing.

Respectfully submitted,

GALLAGHER GIANCOLA LLC

Dated: January 5, 2022

/s/ Russell D. Giancola
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Haroon Bashir, Valerie Biancaniello,
Tegwyn Hughes, and Jeffrey Wenk*

**CERTIFICATE OF COMPLIANCE
WITH PUBLIC ACCESS POLICY**

I certify that this filing complies with the provisions of the *Public Access Policy of the United 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.

GALLAGHER GIANCOLA LLC

Dated: January 5, 2022

/s/ Russell D. Giancola
Kathleen A. Gallagher
Russell D. Giancola

CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2022, I caused a true and correct copy of the foregoing **Witness List and Exhibit List Regarding the Application for Leave to Intervene by Voters of the Commonwealth of Pennsylvania**, to be filed via the Court's PAC File System and email, on the following :

<p>Lalitha D. Madduri Christina A. Ford Jyoti Jasrasaria Elias Law Group LLP 10 G St. NE, Suite 600 Washington, D.C. 20002 lmadduri@elias.law cford@elias.law jjasrasaria@elias.law</p> <p><i>Counsel for Carter Petitioners</i></p>	<p>Edward D. Rogers Marcel S. Pratt Robert J. Clark Michael R. McDonald Paul K. Ort Ballard Spahr LLP 1735 Market Street, 51st Floor Philadelphia, PA 19103 RogersE@ballardspahr.com PrattM@ballardspahr.com ClarkR@ballardspahr.com McDonaldM@ballardspahr.com OrtP@ballardspahr.com</p> <p><i>Counsel for Carter Petitioners</i></p>
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GALLAGHER GIANCOLA LLC

Dated: January 5, 2022

/s/ Russell D. Giancola
Russell D. Giancola