

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

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,

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.

CASES CONSOLIDATED

No. 464 M.D. 2021

No. 465 M.D. 2021

**PROPOSED INTERVENORS-
PETITIONERS' ("CITIZEN-VOTER
INTERVENTORS") ANSWER TO
PETITIONERS'
APPLICATION FOR EXPEDITED
REVIEW**

Counsel of Record for Proposed
Intervenors-Petitioners:

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

Thomas W. King III
PA. ID No. 21580
tking@dmkccg.com

Thomas E. Breth
PA. ID No. 66350
tbreth@dmkccg.com

Jordan P. Shuber
PA. ID No. 31823
ishuber@dmkccg.com

128 West Cunningham Street,
Butler, Pennsylvania 16001
724-283-2200 (phone)
724-283-2298 (fax)

2022 JAN 12 AM 11:38

RECEIVED
COMMONWEALTH COURT
OF PENNSYLVANIA

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.

**PROPOSED INTERVENORS-PETITIONERS' ("CITIZEN-VOTER
INTERVENTORS") ANSWER TO PETITIONERS'
APPLICATION FOR EXPEDITED REVIEW**

AND NOW, come Proposed Intervenor-Petitioners, ("Citizen-Voter Intervenor"), to respectfully file the within Answer to Petitioner's Applications as follows:

1. The Citizen-Voter Intervenor are prepared to abide by any order issued by this Court if they are permitted to intervene.

2. The Citizen-Voter Intervenor prefer the "Carter" Petitioner Proposal as opposed to the "Gressman" Proposal. However, these Intervenor also suggest that the present Order of this Court is achievable and preferable to either such Proposal.

3. The Citizen-Voter Intervenor respectfully suggest, with respect to the "Carter" Proposal that:

- a. We agree that there is no need (or time) for discovery in this process;
- b. We suggest that in addition to filing supporting briefs and expert reports that the parties should be authorized to file written testimony from any source on or before the proposed date of January 21, 2022; and
- c. We propose to eliminate the suggestion that "a party may not later modify or amend its proposed plan" (it is entirely possible that one or more of the Intervenor upon reviewing the proposed plans might either further amend their plan or adopt the plan of another party).

Respectfully submitted,

**DILLON, McCANDLESS, KING,
COUTLER & GRAHAM, L.L.P.**

By: /s/ Thomas W. King, III
Thomas W. King, III
PA. I.D. No. 21580
tking@dmkcg.com

*Counsel for Proposed Citizen-Voter
Intervenors*

CERTIFICATE OF COMPLIANCE

I 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.

/s/ Thomas W. King, III
Thomas W. King, III

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Answer to Petitioner Carters' Application for Expedited Review has been served via email this 12th day of January 2022 upon all counsel of record.

/s/ Thomas W. King, III
Thomas W. King, III