

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

**DOUG MCLINKO,**

Petitioner,

v.

**COMMONWEALTH OF PENNSYLVANIA, DEPARTMENT OF STATE, and VERONICA DEGRAFFENREID,** in her official capacity as Acting Secretary of the Commonwealth of Pennsylvania,

Respondents,

---

**TIMOTHY BONNER, et al.,**

Petitioners,

v.

**DEGRAFFENREID, et al.,**

Respondents,

and

**BUTLER COUNTY REPUBLICAN COMMITTEE; YORK COUNTY REPUBLICAN COMMITTEE; and WASHINGTON COUNTY REPUBLICAN COMMITTEE.**

Intervenors-Petitioners.

**Nos.: 244 M.D. 2021  
293 M.D. 2021 (Consolidated)**

**INTERVENORS-PETITIONERS', BUTLER COUNTY REPUBLICAN COMMITTEE, YORK COUNTY REPUBLICAN COMMITTEE, and WASHINGTON COUNTY REPUBLICAN COMMITTEE, BRIEF IN SUPPORT OF PETITIONERS' APPLICATIONS FOR SUMMARY RELIEF**

Counsel of Record for Intervenors-Petitioners:

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

Thomas W. King III  
PA. ID No. 21580  
[tking@dmkcg.com](mailto:tking@dmkcg.com)

Thomas E. Breth  
PA. ID No. 66350  
[tbreth@dmkcg.com](mailto:tbreth@dmkcg.com)

Jordan P. Shuber  
PA. ID No. 317823  
[jshuber@dmkcg.com](mailto:jshuber@dmkcg.com)

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

**INTERVENORS-PETITIONERS' BUTLER COUNTY REPUBLICAN COMMITTEE, YORK COUNTY REPUBLICAN COMMITTEE, AND WASHINGTON COUNTY REPUBLICAN COMMITTEES' REPLY IN SUPPORT OF PETITIONERS' APPLICATIONS FOR SUMMARY RELIEF**

Intervenors-Petitioners, Butler County Republican Committee, York County Republican Committee, and Washington County Republican Committees (collectively referred to as the “**County Republican Intervenors**”) fully incorporate their: Application to Intervene, Petition for Review, Brief in Support of Application to Intervene, Brief in Support of Petitioners' Applications for Summary Relief, and all exhibits, as if fully set forth at length herein.

The County Republican Intervenors elect not to file any an additional brief to supplement their brief filed on November 2, 2021. Rather, the County Republican Intervenors fully adopt the arguments as set forth by Petitioners and in the pleadings mentioned above. However, the County Republican Intervenors reserve their right to supplement their argument at the oral argument scheduled for November 17, 2021 as their allotted time permits.

Respectfully Submitted,

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

Date: November 9, 2021

By: /s/ Thomas W. King, III  
Thomas W. King III  
PA. ID No. 21580  
[tking@dmkcg.com](mailto:tking@dmkcg.com)

Thomas E. Breth  
PA. ID No. 66350  
[tbreth@dmkcq.com](mailto:tbreth@dmkcq.com)

Jordan P. Shuber  
PA ID No. 317823  
[jshuber@dmkcq.com](mailto:jshuber@dmkcq.com)

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

*Counsel for Intervenors-  
Petitioners, Butler County  
Republican Committee, York  
County Republican Committee,  
and Washington County  
Republican Committee*

## **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