

IN THE SUPREME COURT OF PENNSYLVANIA

| | | |
|-----------------------------|---|---------------|
| CAROL ANN CARTER, et al., | : | No. 7 MM 2022 |
| | : | |
| Petitioners, | : | |
| v. | : | |
| | : | |
| LEIGH M. CHAPMAN, et al.,, | : | |
| | : | |
| Respondents. | : | |
| *** | : | |
| PHILIP T. GRESSMAN, et al., | : | |
| | : | |
| Petitioners, | : | |
| v. | : | |
| | : | |
| LEIGH M. CHAPMAN, et al., | : | |
| | : | |
| Respondents. | : | |

**EXCEPTIONS TO SPECIAL MASTER’S REPORT
BY GUY RESCHENTHALER, JEFFREY VARNER, RYAN
COSTELLO, TOM MARINO, AND BUD SHUSTER**

Per paragraph 5 of the Court’s Order of February 2, 2022,
Guy Reschenthaler, Jeffrey Varner, Ryan Costello, Tom Marino, and
Bud Shuster (collectively, “the Congressional Intervenors”) respectfully
submit the following exceptions to the Report Containing Proposed
Findings of Fact and Conclusion of Law Supporting Recommendation of
Congressional Redistricting Plan and Proposed Revision to the 2022

Election Calendar/Schedule (hereafter, “the Report”) issued on February 7, 2022:

1. The Congressional Intervenors take exception to, and this Court should decline to adopt, the Report’s recommendation to adopt HB 2146 as the congressional plan for Pennsylvania; instead, the Court should adopt Reschenthaler 1 or 2 as the congressional plan for Pennsylvania.

2. The Congressional Intervenors take exception to, and this Court should decline to adopt, the following components of the Report’s recommendations:

- a. The Report’s proposed finding that the Carter plan splits only 13 Counties;
- b. The Report’s proposed finding that only one plan violates the equal population requirement;
- c. The Report’s proposed finding that all of the proposed plans comply with the Voting Rights Act and the Fourteenth Amendment on the present record;
- d. The Report’s misinterpretation of the prohibition against splitting political subdivisions unless “absolutely necessary”; and
- e. The other flaws discussed in the accompanying brief, which addresses these exceptions (and related errors) more fully.

WHEREFORE, the Congressional Intervenors respectfully request that the Court select Reschenthaler 1 or Reschenthaler 2 as the congressional redistricting plan for Pennsylvania.

Respectfully submitted,

Dated: February 14, 2022

/s/ Matthew H. Haverstick
Matthew H. Haverstick (No. 85072)
Joshua J. Voss (No. 306853)
Shohin H. Vance (No. 323551)
Samatha G. Zimmer (No. 325650)
KLEINBARD LLC
Three Logan Square
1717 Arch Street, 5th Floor
Philadelphia, PA 19103
Ph: (215) 568-2000
Fax: (215) 568-0140
Eml: mhaverstick@kleinbard.com
jvoss@kleinbard.com
svance@kleinbard.com
szimmer@kleinbard.com

*Attorneys for Congressional
Intervenors*