

IN THE SUPREME COURT OF PENNSYLVANIA

Docket No. 4 WM 2022

RYAN COVERT, ERIK HULICK, and DARLENE J. COVERT,

Petitioners,

v.

2021 PENNSYLVANIA LEGISLATIVE REAPPORTIONMENT COMMISSION,

Respondent.

**SUPPLEMENTAL APPLICATION FOR ORAL ARGUMENT AND
OTHER RELIEF IN RESPONSE TO THE FEBRUARY 17, 2022, AND
FEBRUARY 23, 2022, ORDERS OF COURT**

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AND NOW come the Petitioners, Ryan Covert, Erik Hulick, and Darlene J. Covert, by and through their attorneys, Jen GV Gilliland Vanasdale and Gilliland Vanasdale Sinatra Law Office, LLC, and file this Supplemental Application for Oral Argument and Other Relief in Response to the February 17, 2022, and February 23, 2022, Orders of Court, and aver the following in support thereof:

1. The Petitioners filed and served yesterday, March 3, 2022, an Application for Oral Argument and Other Relief requesting due process to provide adequate time for review and preparation for this momentous map litigation.

2. This morning, Petitioners received two notifications (See attached **Exhibits A and B**) of additional documents totaling Two Thousand Three Hundred and Twenty-One (2,321) pages from the 2021 Legislative Reapportionment Commission containing apparent transcripts of meetings and testimony spanning from April 26, 2021, to February 4, 2022.

3. It is impossible to adequately review the now over Ten Thousand Six Hundred and Seventy-Nine (10,679) pages and adequately prepare under the current schedules set forth in the Orders at issue in this case.

4. The Petitioners intend to file an Amended Petition for Review on or before the March 7, 2022, deadline to finalize their Challenge that the Final Plan of the 2021 Legislative Reapportionment Commission, as a whole, is contrary to law.

5. Thereafter, the Petitioners – who are citizens of this Commonwealth, need time to adequately review the voluminous record, the anticipated answer and brief of the 2021 Legislative Reapportionment Plan, and respond with brief and oral argument to this Honorable Court.

6. This matter is serious, and the Petitioners should not be deprived adequate due process because of a desire to proceed under the current election

calendar modifications recommended by the Pennsylvania Department of State – itself which is alarming considering the Department of State should be neutral upon notice of challenges to the legislative maps.

7. This case is of the utmost importance to all citizens of this Commonwealth as the outcome will determine our legislative districts for the next decade and this matter should not be rushed.

8. It would be unfair and unjust to the Petitioners, and other challengers, to be deprived of due process and meaningful appellate review.

9. The petitioners that were part of the League of Women Voters and the Carter congressional map litigation did not have deadlines such as set forth in the Orders at issue in this case to date.

10. Surely, state legislative maps, which involve the elections of 203 state house representatives and 50 state senators for the next ten (10) years are just as important as state congressional maps which involve the elections of 17 members to congress.

WHEREFORE, Petitioners respectfully renew their request that this Honorable Court grant the relief sought and enter an appropriate Order, **to include even more time given the additional documents just received.**

Respectfully submitted,
**GILLILAND VANASDALE SINATRA
LAW OFFICE, LLC**

Date: March 4, 2022

By: /s/ Jen GV Gilliland Vanasdale, Esquire

From: "administrator@pacourts.us" <administrator@pacourts.us>

Date: Friday, March 4, 2022 at 8:47 AM

To: Jennifer GV <jennifer@gvlawoffice.com>

Subject: "Agency Transcripts of Testimony" filing for case "Covert, et al, Pets v. 2021 Legislative Reapp Comm" (4 WM 2022)

"Agency Transcripts of Testimony" filing for case "Covert, et al, Pets v. 2021 Legislative Reapp Comm" (4 WM 2022)

A new filing has been created on a case in which you, or the attorney(s) you are proxying for, are participating.

Click the following link to login to PACFile and view this notification: <https://ujsportal.pacourts.us/Secure/eFiling/ViewNotification.aspx?notificationID=118194643>.

This notification was sent on 3/4/2022 8:46 AM.

EXHIBIT "A"

From: "administrator@pacourts.us" <administrator@pacourts.us>
Date: Friday, March 4, 2022 at 10:26 AM
To: Jennifer GV <jennifer@gvlawoffice.com>
Subject: "Agency Transcripts of Testimony" filing for case "Covert, et al, Pets v. 2021 Legislative Reapp Comm" (4 WM 2022)

"Agency Transcripts of Testimony" filing for case "Covert, et al, Pets v. 2021 Legislative Reapp Comm" (4 WM 2022)

A new filing has been created on a case in which you, or the attorney(s) you are proxying for, are participating.

Click the following link to login to PACFile and view this notification: <https://ujportal.pacourts.us/Secure/eFiling/ViewNotification.aspx?notificationID=118198214>.

This notification was sent on 3/4/2022 10:25 AM.

From: "administrator@pacourts.us" <administrator@pacourts.us>
Date: Friday, March 4, 2022 at 10:26 AM
To: Jennifer GV <jennifer@gvlawoffice.com>
Subject: "Agency Transcripts of Testimony" filing for case "Covert, et al, Pets v. 2021 Legislative Reapp Comm (4 WM 2022)

EXHIBIT "B"

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, I caused the foregoing **Supplemental Application for Oral Argument and Other Relief in Response to the February 17, 2022, and February 23, 2022, Orders of Court** to be served upon the following party and in the manner indicated below, which service satisfies the requirements of Pa. R.C.P. 121:

By Email and Certified Mail:

Leah A. Mintz, Esquire
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Counsel for Respondent 2021 Legislative Reapportionment Commission

By Certified Mail:

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414 Grant Street
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By Certified Mail and PACFile:

Office of Attorney General
Strawberry Square, 16th Floor
Harrisburg, PA 17120

/s/ Jen GV Gilliland Vanasdale, Esquire

Dated: March 4, 2022

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provision 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.

Submitted by:

Petitioners

By Counsel:

/s/ Jen GV Gilliland Vanasdale, Esquire
Attorney # 87407

**GILLILAND VANASDALE SINATRA
LAW OFFICE, LLC**