IN THE SUPREME COURT OF PENNSYLVANIA MIDDLE DISTRICT

| | No. | 73 | MM | 2022 |
|--|-----|----|----|------|
|--|-----|----|----|------|

TOM WOLF, Governor of the Commonwealth of Pennsylvania, and LEIGH M. CHAPMAN, Acting Secretary of the Commonwealth of Pennsylvania,

Petitioners,

v.

GENERAL ASSEMBLY OF THE COMMONWEALTH OF PENNSYLVANIA,

Respondent.

PETITIONERS' ANSWER TO APPLICATION FOR LEAVE TO INTERVENE BY THE LEAGUE OF WOMEN VOTERS OF PENNSYLVANIA, SAJDA ADAM AND SIMONE ROBERTS

Gregory G. Schwab General Counsel Office of General Counsel Commonwealth of Pennsylvania 225 Main Capitol Building Harrisburg, PA 17120 Daniel T. Brier Donna A. Walsh John B. Dempsey Richard L. Armezzani Myers, Brier & Kelly, LLP 425 Biden Street, Suite 200 Scranton, PA 18503

Counsel for Tom Wolf, Governor of the Commonwealth of Pennsylvania, and Leigh M. Chapman, Acting Secretary of the Commonwealth of Pennsylvania

Petitioners Tom Wolf, Governor of the Commonwealth of Pennsylvania, and Leigh M. Chapman, Acting Secretary of the Commonwealth, do not oppose the Application for Leave To Intervene by the League of Women Voters of Pennsylvania, Sajda Adam and Simone Roberts. Further, Petitioners join in Proposed Intervenors' legal argument that the amendment to Article VII, § 1 in SB 106 violates the Fourteenth and Twenty-Sixth Amendments to the U.S. Constitution and Article I, § 5 of the Pennsylvania Constitution by restating and reaffirming unconstitutional and invalid voter age and residency requirements. Proposed Intervenors' Application, which further relies upon voter confusion regarding these points, provides additional independent support for invocation of this Court's King's Bench power and for declaring SB 106 constitutionally invalid and enjoining further action on SB 106.

Date: August 24, 2022

Respectfully submitted,

Myers, Brier & Kelly, LLP 425 Biden Street, Suite 200 Scranton, PA 18503 /s/ Daniel T. Brier
Daniel T. Brier
Donna A. Walsh
John B. Dempsey
Richard L. Armezzani

Gregory G. Schwab General Counsel Office of General Counsel 333 Market Street, 17th floor Harrisburg, PA 17101

Attorneys for Tom Wolf, Governor of the Commonwealth of Pennsylvania, and Leigh M. Chapman, Acting Secretary of the Commonwealth of Pennsylvania

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/ Daniel T. Brier

Daniel T. Brier

Date: August 24, 2022

PROOF OF SERVICE

I, Daniel T. Brier, hereby certify that the foregoing Answer to Application for Leave To Intervene was served upon the following counsel via the Court's PACFile system which service satisfies the requirements of Pa.R.A.P. 121:

John J. Cunningham, IV, Esquire Joel L. Frank, Esquire Joseph R. Podraza, Esquire Scott R. Withers, Esquire Lamb McErlane, PC 24 E. Market Street West Chester, PA 19381

Erik R. Anderson, Esquire James J. Kutz, Esquire Erin R. Kawa, Esquire Sean C. Campbell, Esquire Post & Schell, PC 17 North Second Street, 12th Floor Harrisburg, PA 17101

Deborah R. Willig, Esquire Amy L. Rosenberger, Esquire John R. Bielski, Esquire Alaine S. Williams, Esquire Bruce M. Ludwig, Esquire Stuart W. Davidson, Esquire Willig, Williams & Davidson 1845 Walnut Street, 24th Floor Philadelphia, PA 19103 Matthew H. Haverstick, Esquire Joshua J. Voss, Esquire Shohin H. Vance, Esquire Kleinbard LLC Three Logan Square 1717 Arch Street, 5th Floor Philadelphia, PA 19103

Tara L. Hazelwood, Esquire Lam D. Truong, Esquire Matthew S. Salkowski, Esquire Office of Chief Counsel Democratic Caucus Pa. House of Representatives Room 620, Main Capitol Building Harrisburg, PA 17120

Irwin W. Aronson, Esquire Willig, Williams & Davidson 212 Locust Street, Suite 301 Harrisburg, PA 17101

Jessica Schidlow, Esquire CHILD USA 3508 Market Street, Suite 202 Philadelphia, PA 19104 Marci Hamilton 3508 Market Street, Suite 202 Philadelphia, PA 19104

Wendy West Feinstein, Esquire Maureen K. Barber, Esquire Maria L. Sasinoski, Esquire Steven N. Hunchuck, Esquire Morgan, Lewis & Bockius, LLP One Oxford Centre, 32nd Floor 301 Grant Street Pittsburgh, PA 15219

Date: August 24, 2022

John P. Lavelle, Jr., Esquire Harvey Bartle, IV, Esquire Marc J. Sonnenfeld, Esquire Morgan, Lewis & Bockius, LLP 1701 Market Street Philadelphia, PA 19103

/s/ Daniel T. Brier

Daniel T. Brier Attorney for Tom Wolf, Governor of the Commonwealth of Pennsylvania, and Leigh M. Chapman, Acting Secretary of the Commonwealth of Pennsylvania