

Intervenor-Petitioners Leader Joanna E. McClinton (“Leader McClinton”) and the Democratic Caucus of the Pennsylvania House of Representatives (“House Democratic Caucus”) submit this Answer to the Preliminary Objections filed by Intervenor-Respondents Senator Kim Ward and the Pennsylvania Senate Republican Caucus. A brief in further support of this Answer and Petitioners’ Application for Summary Relief was filed on November 10, 2022.

ANSWER TO ALLEGATIONS DENOMINATED “INTRODUCTION”

1. Admitted in part; denied in part. Admitted that the General Assembly passed SB 106 and the yeas and nays of each Representative were recorded with regard to SB 106 in its entirety; Leader McClinton and the House Democratic Caucus deny that the yeas and nays were recorded in the manner that Article XI, § 1 mandates. To the contrary, the House conducted an omnibus vote on all five “separate and distinct” amendments in SB 106 in violation of Article XI, § 1. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

2. Admitted in part; denied in part. Admitted that Petitioners Governor Tom Wolf and Acting Secretary Leigh M. Chapman filed a Petition for Review (the “Petition”) before this Court on September 23, 2022. The remainder of the allegations in this paragraph concern a written document that speaks for itself and

Leader McClinton and the House Democratic Caucus deny all characterizations of it.

3. Denied. The relief requested by Petitioners is set forth in the Petition, which is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

4. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it.

5. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it.

6. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it.

7. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it.

8. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it.

9. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations. By way of further response, Leader McClinton and the House Democratic Caucus have standing, do not seek an impermissible advisory opinion, and their claims succeed as a matter of law.

ANSWER TO ALLEGATIONS DENOMINATED “BACKGROUND”

10. Denied. SB 106 is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph and the footnote accompanying the “Background” heading (fn. 1) are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

11. Admitted in part; denied in part. Admitted that by a 28-22 vote on July 8, 2022, the Senate passed SB 106 in its entirety. Denied that the vote occurred in the manner that Article XI, § 1 mandates, as the yeas and nays were not recorded with regard to each individual amendatory provision contained within SB 106.

12. Admitted in part; denied in part. Admitted only that the yeas and nays of each Senator were recorded with regard to SB 106 in its entirety. Leader McClinton and the House Democratic Caucus specifically deny that the yeas and nays were recorded in the manner that Article XI, § 1 mandates. The remainder of the allegations in this paragraph concern written documents that speak for themselves and Leader McClinton and the House Democratic Caucus deny all characterizations of them.

13. Admitted in part; denied in part. Admitted that on July 8, the House passed SB 106 in a 107-92 vote. Leader McClinton and the House Democratic Caucus specifically deny that the yeas and nays were recorded in the manner that Article XI, § 1 mandates. To the contrary, the House conducted an omnibus vote on all five “separate and distinct” amendments in SB 106 in violation of Article XI, § SB 106. The remainder of the allegations in this paragraph are denied.

14. Admitted in part; denied in part. Admitted only that the yeas and nays of each Representative were recorded with regard to SB 106 in its entirety. Leader McClinton and the House Democratic Caucus specifically deny that the yeas and nays were recorded in the manner that Article XI, § 1 mandates. The remainder of the allegations in this paragraph concern written documents that speak for themselves and Leader McClinton and the House Democratic Caucus deny all characterizations of them.

15. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

16. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

17. Admitted in part; denied in part. It is admitted only that a notice was published in the Pennsylvania Bulletin on July 30, 2022. The notice is a writing that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it.

18. Admitted in part; denied in part. Admitted that publication of SB 106 commenced in August of 2022. The remainder of the allegations in this paragraph concern a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it.

19. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

20. Denied. This paragraph concerns a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it.

21. Denied. This paragraph concerns a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it.

22. Denied. This paragraph concerns a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it.

23. Denied. This paragraph concerns a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remaining allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

24. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

25. Denied. This paragraph concerns a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it.

26. Denied. This paragraph concerns written documents that speak for themselves and Leader McClinton and the House Democratic Caucus deny all characterizations of them.

27. Admitted in part; denied in part. Admitted that certain proposed amendments were adopted by the electorate in the 2001 primary election. Ballot questions are written documents that speak for themselves and Leader McClinton and the House Democratic Caucus deny all characterizations of them.

28. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

29. Denied. This paragraph concerns a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it.

30. Denied. This paragraph concerns written documents that speak for themselves and Leader McClinton and the House Democratic Caucus deny all characterizations of them.

31. Denied. This paragraph concerns written documents that speak for themselves and Leader McClinton and the House Democratic Caucus deny all characterizations of them. The remaining allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

**ANSWER TO ALLEGATIONS DENOMINATED “PRELIMINARY
OBJECTION NO. 1”**

32. Leader McClinton and the House Democratic Caucus incorporate the preceding paragraphs of this Answer as if set forth at length herein.

33. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

34. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

35. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

36. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

37. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

38. Denied. The allegations in this paragraph and the accompanying footnote (fn. 6) are legal conclusions to which no response is required. To the extent

a response is required, Leader McClinton and the House Democratic Caucus deny the allegations in both the paragraph and the footnote.

39. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

40. Denied. This paragraph concerns written documents that speak for themselves and Leader McClinton and the House Democratic Caucus deny all characterizations of them. The remaining allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

41. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

42. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

43. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

44. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

45. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

WHEREFORE, Leader McClinton and the House Democratic Caucus request that this Court overrule this Preliminary Objection.

**ANSWER TO ALLEGATIONS DENOMINATED “PRELIMINARY
OBJECTION NO. 2”**

46. Leader McClinton and the House Democratic Caucus incorporate the preceding paragraphs of this Answer as if set forth at length herein.

47. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

48. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

49. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

WHEREFORE, Leader McClinton and the House Democratic Caucus request that this Court overrule this Preliminary Objection.

**ANSWER TO ALLEGATIONS DENOMINATED “PRELIMINARY
OBJECTION NO. 3”**

50. Leader McClinton and the House Democratic Caucus incorporate the preceding paragraphs of this Answer as if set forth at length herein.

51. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

52. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

53. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

54. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

55. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

56. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

57. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

58. Denied. The relief requested by Petitioners is set forth in the Petition, which is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

59. Denied. The Petition, is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

60. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

61. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

62. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

WHEREFORE, Leader McClinton and the House Democratic Caucus request that this Court overrule this Preliminary Objection.

**ANSWER TO ALLEGATIONS DENOMINATED “PRELIMINARY
OBJECTION NO. 4”**

63. Leader McClinton and the House Democratic Caucus incorporate the preceding paragraphs of this Answer as if set forth at length herein.

64. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

65. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which

no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

66. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

67. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

68. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

69. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

70. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

71. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

72. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

WHEREFORE, Leader McClinton and the House Democratic Caucus request that this Court overrule this Preliminary Objection.

**ANSWER TO ALLEGATIONS DENOMINATED “PRELIMINARY
OBJECTION NO. 5”**

73. Leader McClinton and the House Democratic Caucus incorporate the preceding paragraphs of this Answer as if set forth at length herein.

74. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

75. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

76. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

77. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

78. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

79. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which

no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

80. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

WHEREFORE, Leader McClinton and the House Democratic Caucus request that this Court overrule this Preliminary Objection.

**ANSWER TO ALLEGATIONS DENOMINATED “PRELIMINARY
OBJECTION NO. 6”**

81. Leader McClinton and the House Democratic Caucus incorporate the preceding paragraphs of this Answer as if set forth at length herein.

82. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

83. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

84. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of

it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

85. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

86. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

87. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

88. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

89. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

90. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

91. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

92. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

WHEREFORE, Leader McClinton and the House Democratic Caucus request that this Court overrule this Preliminary Objection.

**ANSWER TO ALLEGATIONS DENOMINATED “PRELIMINARY
OBJECTION NO. 7”**

93. Leader McClinton and the House Democratic Caucus incorporate the preceding paragraphs of this Answer as if set forth at length herein.

94. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

95. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

96. Denied. This paragraph concerns a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

97. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

98. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

99. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

100. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

101. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

102. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

WHEREFORE, Leader McClinton and the House Democratic Caucus request that this Court overrule this Preliminary Objection.

**ANSWER TO ALLEGATIONS DENOMINATED “PRELIMINARY
OBJECTION NO. 8”**

103. Leader McClinton and the House Democratic Caucus incorporate the preceding paragraphs of this Answer as if set forth at length herein

104. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

105. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it.

106. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

107. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

108. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

109. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

110. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

111. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

112. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

113. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

114. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

115. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

116. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

117. Denied. The Petition is a written document that speaks for itself and Leader McClinton and the House Democratic Caucus deny all characterizations of it. The remainder of the allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

118. Denied. The allegations in this paragraph are legal conclusions to which no response is required. To the extent a response is required, Leader McClinton and the House Democratic Caucus deny the allegations.

WHEREFORE, Leader McClinton and the House Democratic Caucus request that this Court overrule this Preliminary Objection.

CONCLUSION

For foregoing reasons, and the reasons that were set forth in Leader McClinton and the House Democratic Caucus's November 10 brief in support of Petitioners' Application for Summary Relief and in Opposition to the Preliminary Objections of Respondent and Intervenor-Respondents, Intervenor-Respondents Senator Kim Ward and the Pennsylvania Senate Republican Caucus's Preliminary Objections should be overruled.

Dated: November 18, 2022

Respectfully submitted:

/s/ Leslie E. John

Leslie E. John
john@ballardspahr.com
Emilia McKee Vassallo
mckeevassallo@ballardspahr.com
Elizabeth V. Wingfield
wingfielde@ballardspahr.com
Erin Fischer
fischere@ballardspahr.com
BALLARD SPAHR LLP
1735 Market Street, 51st Floor
Philadelphia, PA 19103-7599
Telephone: 215.665.8500
Facsimile: 215.864.8999

*Attorneys for Intervenor-Petitioners,
Representative Joanna McClinton and the
Democratic Caucus of the Pennsylvania
General Assembly*

VERIFICATION

I, Joanna E. McClinton, am the elected state representative for the 191st legislative district and the leader of the Pennsylvania House Democratic Caucus and am authorized to swear and affirm that the factual allegations contained in the attached Democratic House Intervenors' Answer in Opposition to Preliminary Objections Filed by Respondent Senator Kim Ward and the Senate Republican Caucus on behalf of myself and the Pennsylvania House Democratic Caucus are true and correct to the best of my knowledge, information, and belief. This statement is made pursuant to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsifications to authorities.

Date: 11/17/2022


Joanna E. McClinton

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.

Date: November 18, 2022

/s/ Elizabeth V. Wingfield

Elizabeth V. Wingfield

BALLARD SPAHR, LLP

1735 Market Street, 51st Floor

Philadelphia, PA 19103-7599

T: (215) 864-8128

F: (215) 864-8999

WingfieldE@ballardspahr.com

*Counsel for Representative
Joanna McClinton and the
Democratic Caucus of the
Pennsylvania General Assembly*