

IN RE: THE MATTER OF THE 2016  
PRESIDENTIAL ELECTION,

: IN THE COMMONWEALTH COURT OF  
: PENNSYLVANIA

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: No. 659 M.D. 2016

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: ELECTION MATTER

**ORDER**

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 2016, in consideration of the Motion for Leave to File Brief of *Amicus Curiae* the American Center for Law and Justice, filed pursuant to Pennsylvania Rule of Civil Procedure No. 531(b)(1)(iii), the Motion is hereby granted for good cause shown, and *Amicus Curiae* is hereby granted leave to file its Brief.

BY THE COURT,

\_\_\_\_\_  
J.

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**MOTION FOR LEAVE TO FILE BRIEF OF *AMICUS CURIAE* THE AMERICAN  
CENTER FOR LAW AND JUSTICE IN SUPPORT OF RESPONDENTS**

RECEIVED  
COMMONWEALTH COURT  
OF PENNSYLVANIA  
-2 DEC 2016 13

NOW COMES, *Amicus Curiae* the American Center for Law and Justice (ACLJ), by and through their attorney, Gregory R. Reed, Esquire, and Joshua A. Reed, Esquire, and respectfully petitions this Court pursuant to Pennsylvania Rule of Civil Procedure No. 531(b)(1)(iii) for leave to file its Brief of *Amicus Curiae* in support of Respondents in the above-captioned action, and in support thereof states the following:

1. As further described in the Statement of Interest of *Amicus Curiae* in its proposed Brief, *Amicus Curiae* the American Center for Law and Justice has considerable experience in cases involving election and constitutional law, including cases before the U.S. Supreme Court and numerous state and federal courts.

2. The proper resolution of this case is a matter of utmost concern to the American Center for Law and Justice because of its impact on the integrity of American presidential election process.

3. Thousands of members of *Amicus Curiae* the American Center for Law and Justice reside in the Commonwealth of Pennsylvania, and at least 692 Pennsylvanians have joined the ACLJ's Committee to Protect the Integrity of the 2016 Election Process.

4. The proposed Brief of *Amicus Curiae* the American Center for Law and Justice does not exceed any applicable word or page limit.

5. The proposed Brief of *Amicus Curiae* the American Center for Law and Justice is filed contemporaneously herewith.

6. *Amicus Curiae* the American Center for Law and Justice believes its Brief will be of assistance to this Court in a particularly unique type of proceeding now before it.

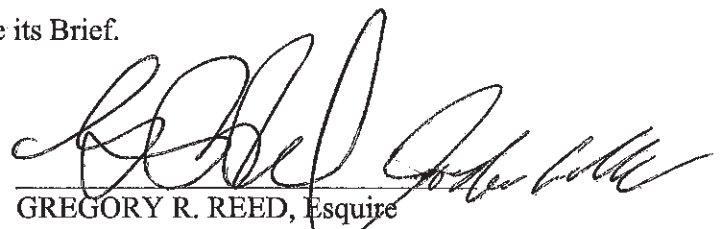
7. Petitioners have not delayed in filing this Petition for Intervention.

8. The allowance of *Amicus Curiae's* Brief will not unduly delay or prejudice the trial or the adjudication of the rights of the parties.

9. Alternatively, to the extent the schedule set by this Court in its per curiam Order entered November 29, 2016, should be construed as a merits briefing schedule, then *Amicus Curiae* may file its Brief as of right pursuant to Pennsylvania Rule of Civil Procedure No. 531(b)(1)(i). Out of an abundance of caution and respect for this Court's authority and decorum, *Amicus Curiae* seeks leave to file its Brief.

WHEREFORE, *Amicus Curiae* the American Center for Law and Justice respectfully requests this Honorable Court to grant leave to file its Brief.

Date: December 2, 2016



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## PROOF OF SERVICE

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I hereby certify that on this 2nd day of December, 2016, I am serving the foregoing Motion for Leave to File Brief of *Amicus Curiae* to the persons stated below in the manner indicated, which service satisfies the requirements of 210 PA. CODE R. 121:

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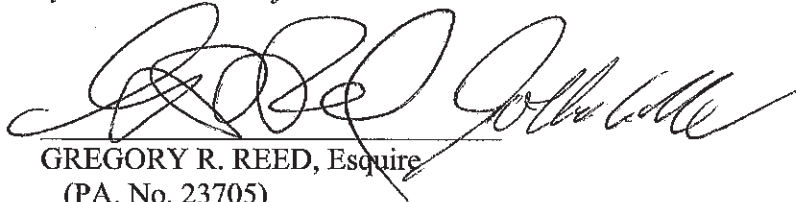
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