

OBERMAYER REBMANN MAXWELL & HIPPEL LLP

Lawrence J. Tabas (PA Attorney ID No. 27815)

Rebecca L. Warren (PA Attorney ID No. 63669)

Timothy J. Ford (DC Attorney ID No. 1031863), *Pro Hac Vice*

Centre Square West

1500 Market Street, Suite 3400

Philadelphia, PA 19102

(215) 665-3000

Attorneys for Proposed Intervenors

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

LEAGUE OF WOMEN VOTERS :

OF PENNSYLVANIA, et al. :

Petitioners :

v. :

: Docket No. 261 MD 2017

THE COMMONWEALTH OF :

PENNSYLVANIA, et al. :

Respondents :

INTERVENORS' ANSWER TO NEW MATTER OF RESPONDENTS
MICHAEL C. TURZAI AND JOSEPH B. SCARNATI III

ANSWER TO NEW MATTER

Intervenors Brian McCann, Daphne Goggins, Carl Edward Pfeifer, Jr., Michael Baker, Cynthia Ann Robbins, Ginny Steese Richardson, Carol Lynne Ryan, Joel Sears, Kurtis D. Smith, C. Arnold McClure, Karen C. Cahilly, Vicki Lightcap, Wayne Buckwalter, Ann Marshall Pilgreen, Ralph E. Wike, Martin C.D. Morgis, Richard J. Tems, James Taylor, Lisa V. Nancollas, Hugh H. Sides, Mark J. Harris, William P. Eggleston, Jacqueline D. Kulback, Timothy D. Cifelli, Ann M. Dugan, Patricia J. Felix, Scott Uehlinger, Brandon Robert Smith, Glen Beiler, Tegwyn Hughes, Thomas Whitehead, David Moylan, Kathleen Bowman, James R. Means, Jr., Barry O. Christenson, Bryan Leib, and Rick Saccone file the following Answer to Petitioners' Petition for Review Addressed to the Court's Original Jurisdiction, with New Matter:

121. Intervenors incorporate by reference paragraphs 1–120 of their Answer to Petitioners' Petition for Review Addressed to the Court's Original Jurisdiction, filed November 17, 2017.

122. The averments contained in paragraph 122 are conclusions of law, to which no response is required.

123. The averments contained in paragraph 123 are conclusions of law, to which no response is required.

124. The averments contained in paragraph 124 are conclusions of law, to

which no response is required.

125. The averments contained in paragraph 125 are conclusions of law, to which no response is required.

126. The averments contained in paragraph 126 are conclusions of law, to which no response is required.

127. The averments contained in paragraph 127 are conclusions of law, to which no response is required.

128. The averments contained in paragraph 128 are conclusions of law, to which no response is required.

129. The averments contained in paragraph 129 are conclusions of law, to which no response is required.

130. The averments contained in paragraph 130 are conclusions of law, to which no response is required.

131. Admitted upon information and belief.

132. The averments contained in paragraph 132 are conclusions of law, to which no response is required.

133. Denied. After a reasonable investigation, the Intervenor is without knowledge or information sufficient to form a belief as to the averments' truth.

134. Admitted upon information and belief.

135. The averments contained in paragraph 135 are conclusions of law, to

which no response is required.

WHEREFORE, the Intervenors respectfully request that this Honorable Court enter judgment in their favor, together with such further relief, as the Court deems just and appropriate.

Respectfully submitted,

**OBERMAYER REBMANN MAXWELL &
HIPPEL LLP**

/s/ Lawrence J. Tabas

Lawrence J. Tabas, PA I.D. No. 27815
OBERMAYER REBMANN MAXWELL & HIPPEL LLP
Centre Square West
1500 Market Street, Suite 3400
Philadelphia, PA 19102
Phone: 215-665-3158
Email: lawrence.tabas@obermayer.com

/s/ Rebecca L. Warren

Rebecca L. Warren, PA I.D. No. 63669
OBERMAYER REBMANN MAXWELL & HIPPEL LLP
Centre Square West
1500 Market Street, Suite 3400
Philadelphia, PA 19102
Phone: 215-665-3026
Email: rebecca.warren@obermayer.com

/s/ Timothy J. Ford

Timothy J. Ford, DC I.D. No. 1031863
Admission *Pro Hac Vice*
OBERMAYER REBMANN MAXWELL & HIPPEL LLP
Centre Square West
1500 Market Street, Suite 3400
Philadelphia, PA 19102
Phone: 215-665-3004
Email: timothy.ford@obermayer.com