

**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*

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**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 :

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**INTERVENORS' ANSWER TO NEW MATTER OF ACTING  
SECRETARY OF THE COMMONWEALTH ROBERT TORRES AND  
COMMISSIONER OF ELECTIONS JONATHAN MARKS**

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

123. Denied. After a reasonable investigation, the Intervenors are without knowledge or information sufficient to form a belief as to the averments' truth.

124. Denied. After a reasonable investigation, the Intervenors are without

knowledge or information sufficient to form a belief as to the averments' truth.

125. Denied. After a reasonable investigation, the Intervenors are without knowledge or information sufficient to form a belief as to the averments' truth.

126. Denied. After a reasonable investigation, the Intervenors are without knowledge or information sufficient to form a belief as to the averments' truth.

127. Denied. After a reasonable investigation, the Intervenors are without knowledge or information sufficient to form a belief as to the averments' truth.

128. Denied. After a reasonable investigation, the Intervenors are without knowledge or information sufficient to form a belief as to the averments' truth.

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