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**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

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League of Women Voters of Pennsylvania, *et al.*,

*Petitioners,*

v.

The Commonwealth of Pennsylvania, *et al.*,

*Respondents.*

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**No. 261 MD 2017**

**PETITIONERS' REPLY TO NEW MATTER OF RESPONDENTS  
SPEAKER OF THE HOUSE MICHAEL C. TURZAI, SENATE  
PRESIDENT PRO TEMPORE JOSEPH B. SCARNATI, AND THE  
GENERAL ASSEMBLY**

Petitioners submit this Reply to New Matter of Respondents Speaker of the House Michael C. Turzai, Senate President Pro Tempore Joseph B. Scarnati, and the General Assembly.

121. This is an incorporation paragraph referring to the Answer of Speaker Turzai and President Pro Tempore Scarnati, to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

122. Denied. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

123. Denied. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

124. Denied. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

125. Denied. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

126. Denied. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

127. Denied. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

128. Denied. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

129. Denied. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

130. Denied. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

131. Denied. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied. By way of further response, the 2011 Plan was an unlawful partisan gerrymander that violates the Pennsylvania Constitution. *See, e.g.*, Petition for Review, ¶¶ 2, 108, 116.

132. Denied. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied. By way of further response, the 2011 Plan was an unlawful partisan gerrymander that violates the Pennsylvania Constitution. *See, e.g.*, Petition for Review, ¶¶ 2, 108, 116.

133. Denied. The 2011 Plan was crafted through a secret process that ended with the final district maps being revealed mere hours before the final vote approving the Plan. Petition for Review, ¶ 49.

134. Denied. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied. By way of further response, the 2011 Plan was an unlawful partisan gerrymander that violates the Pennsylvania Constitution. *See, e.g.*, Petition for Review, ¶¶ 2, 108, 116.

135. Denied. The averments in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, this paragraph is denied.

WHEREFORE, Petitioners respectfully request that the Court not enter judgment in favor of Speaker Turzai, President Pro Tempore Scarnati, and the General Assembly.

Dated: November 22, 2017

Respectfully submitted,

/s/ Mary M. McKenzie

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