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**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

*Respondents.*

**RESPONDENTS MICHAEL C. TURZAI AND JOSEPH B. SCARNATI III'S  
REPLY TO INTERVENORS' NEW MATTER**

Respondents Michael C. Turzai and Joseph B. Scarnati III (“Legislative Respondents”), by and through their undersigned counsel, hereby file their Reply to Intervenor’s New Matter and state as follows:

**Reply to Intervenor’s New Matter**

121. Legislative Respondents lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the New Matter.

122. Legislative Respondents lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the New Matter.

123. Legislative Respondents lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the New Matter.

124. Legislative Respondents lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the New Matter.

125. Admitted.

126. Admitted.

127. Legislative Respondents lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the New Matter.

127. Legislative Respondents lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the New Matter.<sup>1</sup>

128. Legislative Respondents lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the New Matter.

129. Legislative Respondents lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the New Matter.

130. Legislative Respondents lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the New Matter.

131. Legislative Respondents lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the New Matter.

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<sup>1</sup> Intervenors' Answer and New Matter contains two paragraphs numbered 127. Respondents have remained consistent with that numbering for ease of reference.

132. Legislative Respondents lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the New Matter.

133. Legislative Respondents lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the New Matter.

134. Upon information and belief, admitted.

135. Legislative Respondents lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the New Matter.

136. Legislative Respondents lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the New Matter.

137. Legislative Respondents lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in this Paragraph of the New Matter.

138. The allegations set forth in this paragraph of the New Matter are based on a written document that speaks for itself.

139. The allegations set forth in this paragraph of the New Matter are based on a written document that speaks for itself.

140. The allegations set forth in this paragraph of the New Matter are based on a written document that speaks for itself.

141. The allegations set forth in this paragraph of the New Matter are based on a written document that speaks for itself.

WHEREFORE, Legislative Respondents respectfully request that the Court enter judgment in their favor, together with any such other and further relief, as the Court deems just and appropriate.

Dated: November 22, 2017

Respectfully Submitted,

**BLANK ROME LLP**

**CIPRIANI & WERNER PC**

/s/ Brian S. Paszamant  
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*Representative Michael C. Turzai*

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*Senator Joseph B. Scarnati III*

**HOLTZMAN VOGEL JOSEFIAK  
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*/s/ Jason Torchinsky*

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*Attorneys for Respondents Senator*

*Joseph B. Scarnati III and*

*Representative Michael C. Turzai*

## VERIFICATION

I, Kathleen A. Gallagher, Esquire, counsel for Michael C. Turzai (“the Speaker”), hereby state that a Verification from the Speaker to verify the foregoing Reply to Intervenor’s New Matter could not be obtained within the time allowed for filing. I verify that the statements set forth in the foregoing Reply are true and correct to the best of my knowledge, information, and belief, and that a substitute Verification from the Speaker will be filed as soon as it can be secured. I understand that these statements are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.

Dated: November 22, 2017

Respectfully submitted,

/s/Kathleen A. Gallagher  
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*Counsel for Representative  
Michael C. Turzai, In His Capacity  
as Speaker of the Pennsylvania  
House of Representatives*

## **VERIFICATION**

I, Brian S. Paszamant, counsel for Joseph B. Scarnati, III (“Senator Scarnati”), hereby state that a Verification from Senator Scarnati to verify the foregoing Reply to Intervenor’s New Matter could not be obtained within the time allowed for filing. I verify that the statements set forth in the foregoing Reply are true and correct to the best of my knowledge, information, and belief, and that a substitute Verification from Senator Scarnati will be filed as soon as it can be secured. I understand that these statements are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.

Dated: November 22, 2017

### **BLANK ROME LLP**

*/s/ Brian S. Paszamant*

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