

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

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

Reply to New Matter

121. This Paragraph is an incorporation paragraph to which no response is required.

122. The allegations set forth in this Paragraph of the New Matter is a legal conclusion to which no response is required.

123. Admitted.

124. Upon information and belief, admitted.

125. Upon information and belief, admitted.

126. Upon information and belief, admitted.

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

/s/ Brian S. Paszamant

BRIAN S. PASZAMANT
JASON A. SNYDERMAN
JOHN P. WIXTED
One Logan Square
130 N. 18th Street
Philadelphia, Pennsylvania 19103
Phone: 215-569-5791
Facsimile: 215-832-5791
Email: paszamant@blankrome.com
snyderman@blankrome.com
jwixed@blankrome.com

Attorneys for Respondent
Senator Joseph B. Scarnati III

**HOLTZMAN VOGEL JOSEFIAK
TORCHINSKY PLLC**

/s/ Jason Torchinsky

JASON TORCHINSKY
(admitted *Pro Hac Vice*)
SHAWN SHEEHY
(admitted *Pro Hac Vice*)
45 North Hill Drive, Suite 100
Warrenton, Virginia 20186
Phone: 540-341-8808
Facsimile: 540-341-8809
Email: jtorchinsky@hvjt.law
ssheehy@hvjt.law

Attorneys for Respondents
Senator Joseph B. Scarnati III and
Representative Michael C. Turzai

CIPRIANI & WERNER PC

/s/ Kathleen A. Gallagher

KATHLEEN A. GALLAGHER
CAROLYN BATZ MCGEE
650 Washington Road, Suite 700
Pittsburgh, Pennsylvania 15228
Phone: 412-563-4978
Email: kgallagher@c-wlaw.com
cmcgee@c-wlaw.com

Attorneys for Respondent
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 Governor Tom Wolf’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

Kathleen A. Gallagher

PA Attorney # 37950

Carolyn Batz McGee

PA Attorney # 208815

Cipriani & Werner, P.C.

650 Washington Road, Suite700

Pittsburgh, PA 15228

Phone: 412.563.2500

Email: kgallagher@c-wlaw.com

Email: cmcgee@c-wlaw.com

Email: jhall@c-wlaw.com

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 Respondent Governor Tom Wolf’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

BRIAN S. PASZAMANT

One Logan Square

130 N. 18th Street

Philadelphia, Pennsylvania 19103

Phone: 215-569-5791

Facsimile: 215-832-5791

Email: Paszamant@blankrome.com

*Attorneys for Respondent Defendant
Senator Joseph B. Scarnati, III*