
IN THE

Supreme Court of Pennsylvania

Middle District 159 MM 2017 LE

LEAGUE OF WOMEN VOTERS OF PENNSYLVANIA, CARMEN FEBO SAN MIGUEL,
JAMES SOLOMON, JOHN GREINER, JOHN CAPOWSKI, GRETCHEN BRANDT,
THOMAS RENTSCHLER, MARY ELIZABETH LAWN, LISA ISAACS, DON LANCASTER,
JORDI COMAS, ROBERT SMITH, WILLIAM MARX, RICHARD MANTELL, PRISCILLA
MCNULTY, THOMAS ULRICH, ROBERT MCKINSTRY, MARK LICHTY, LORRAINE
PETROSKY, Petitioners,

v.

THE COMMONWEALTH OF PENNSYLVANIA; THE PENNSYLVANIA GENERAL
ASSEMBLY; THOMAS W. WOLF, IN HIS CAPACITY AS GOVERNOR OF
PENNSYLVANIA; MICHAEL J. STACK III, IN HIS CAPACITY AS LIEUTENANT
GOVERNOR OF PENNSYLVANIA AND PRESIDENT OF THE PENNSYLVANIA
SENATE; MICHAEL C. TURZAI, IN HIS CAPACITY AS SPEAKER OF THE
PENNSYLVANIA HOUSE OF REPRESENTATIVES; JOSEPH B. SCARNATI III, IN HIS
CAPACITY AS PENNSYLVANIA SENATE PRESIDENT PRO TEMPORE; ROBERT
TORRES, IN HIS CAPACITY AS ACTING SECRETARY OF THE COMMONWEALTH OF
PENNSYLVANIA; JONATHAN M. MARKS, IN HIS CAPACITY AS COMMISSIONER OF
THE BUREAU OF COMMISSIONS, ELECTIONS, AND LEGISLATION OF THE
PENNSYLVANIA DEPARTMENT OF STATE, Respondents.

On Appeal from the Commonwealth Court of Pennsylvania at No. 261 MD 2017

PETITION TO FILE AMICUS BRIEF NONC PRO TUNC ON BEHALF OF CONCERNED CITIZENS FOR DEMOCRACY

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Concerned Citizens for Democracy, through undersigned counsel, respectfully requests this Court to allow the filing of the within amicus brief Nunc Pro Tunc on the issue of how to implement the criteria set forth in this Court's Order of January 22, 2018 for drawing Pennsylvania's Congressional maps.

The last reply brief in this matter was due on January 12, 2018.

The brief proposes a methodology for the implementing the Court's January 22, 2018 Order which makes partisan redistricting geometrically and geographically difficult or impossible. The brief also explains how the strict application of the Court's criteria for redistricting will create a neutral, judicially manageable standard for Courts to evaluate proposed Congressional maps in order to ensure the rights of all Pennsylvanians to free and equal elections is preserved.

The brief presents ideas that have not previously been presented to the Court by any party. The ideas may be very useful to the redistricting experts of all parties and the expert appointed by the Court.

Respectfully submitted,

February 4, 2018

/s/ Brian A. Gordon

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CERTIFICATE OF SERVICE

I, the undersigned, certify that a true and correct copy of the foregoing Petition to File Amicus Brief Nunc Pro Tunc on behalf of Concerned Citizens for Democracy was served upon all counsel of record, via electronic service, on this date.

February 4, 2018

/s/ Brian A. Gordon

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