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Attorneys for Petitioners

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LEAGUE OF WOMEN VOTERS OF	:	
PENNSYLVANIA and LORRAINE HAW,	:	COMMONWEALTH COURT
	:	OF PENNSYLVANIA
Petitioners,	:	
v.	:	ORIGINAL JURISDICTION
	:	
	:	No. 578 MD 2019
	:	
KATHY BOOCKVAR, THE ACTING	:	
SECRETARY OF THE COMMONWEALTH,	:	
	:	
Respondent.	:	
	:	

**PETITIONERS' AMENDED WITNESS AND EXHIBIT LISTS AND
STATEMENT ON ANTICIPATED DURATION
FOR PRELIMINARY INJUNCTION HEARING**

Pursuant to the Court's Order dated October 15, 2019, Petitioners the
League of Women Voters of Pennsylvania and Lorraine Haw (together,

“Petitioners”) submit the following witness and *amended* exhibit lists and statement concerning the hearing on Petitioners’ Application for Special Relief in the Form of a Preliminary Injunction Under Pa.R.A.P. 1532, which is scheduled for October 23, 2019.

I. PETITIONERS’ LIST OF WITNESSES

Petitioners hereby identify the following witnesses whom, absent stipulations, Petitioners may call to testify at the preliminary injunction hearing. This list is based on information reasonably available to Petitioners at this time. Petitioners reserve the right to revise, correct, supplement, or clarify this disclosure.

Petitioners expect to call the following witnesses at the hearing:

1. Jamie Mogil (or other organizational representative), League of Women Voters of Pennsylvania

Jamie Mogil of the League of Women Voters of Pennsylvania will testify about her role with the League. She will testify about the mission and membership of the League and the work the League does in Pennsylvania. In specific, she will explain that the League is concerned with protecting Pennsylvanians’ right to vote and maximizing their opportunities to exercise that right. She will testify how the Marsy’s Law ballot question threatens to deprive the League’s members of their right to decide what changes to make to the Pennsylvania Constitution.

2. Lorraine Haw

Lorraine Haw is a Pennsylvania voter. She will testify about her experiences as both a victim and the accused in criminal proceedings in Pennsylvania. She will testify about her plans to vote in the November 2019 election and the dilemma she would face if forced to vote on the Marsy's Law ballot question in its current form, as she supports certain rights for victims in Marsy's Law to be included in the Pennsylvania Constitution but does not support all of the rights in the Marsy's Law amendment. She will also testify about her application for a pardon of her criminal convictions from the Governor and how her application may be affected if the Pennsylvania Constitution is amended to include Marsy's Law in its proposed form.

Petitioners reserve the right to call any individual identified or called as a witness in this action by Respondent or Intervenors, including each of the persons identified in Respondent's or Intervenors' witness lists. Petitioners further reserve the right to add additional witnesses necessary to rebut testimony by witnesses or exhibits presented by Respondent or Intervenors.

II. PETITIONERS' LIST OF EXHIBITS

The exhibits listed below will be furnished to counsel for Respondent, Intervenor, and to the Court. Petitioners reserve the right to supplement, amend, correct, and/or clarify these exhibits upon the provision of timely notice.

Petitioners further reserve the right to use any of the exhibits listed on Respondent's or Intervenor's exhibit lists and add additional exhibits necessary to rebut testimony by witnesses or exhibits presented by Respondent or Intervenor.

<u>Exh. No.</u>	<u>Description</u>
P-1	Certified Ballot Question, Plain English Statement of the Attorney General, and Joint Resolution 2019-1
P-2	Chester County Official Absentee Municipal General Election Ballot
P-3	Chester County Official Municipal General Election Ballot
P-4	Cumberland County Official Absentee Municipal General Election Ballot
P-5	Cumberland County Official Municipal Election Ballot
P-6	Voter Registration Status for Lorraine Haw (redacted), Public Record from Pennsylvania Department of State website , https://www.pavoterservices.pa.gov/pages/voterregistrationstatus.aspx
P-7	Declaration of Lorraine Haw (Oct. 9, 2019)
P-8	Declaration of Jill Greene of the League of Women Voters of Pennsylvania (Oct. 10, 2019)
P-9	League of Women Voters of Pennsylvania Membership Webpage, https://www.palwv.org/membership

P-10	League of Women Voters of Pennsylvania, <i>Issue: Marsy's Law or "Crimes Victims' Rights Amendment,"</i> https://www.palwv.org/marsys-law
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III. PETITIONERS' STATEMENT ON ANTICIPATED DURATION OF THE HEARING

Petitioners submit that the hearing in this matter (including all witness testimony and argument) can be completed in approximately 4 hours. Petitioners request that each side be allotted up to 30 minutes for oral argument. Petitioners respectfully ask to reserve the right to apportion some of their time for rebuttal argument.

Date: October 21, 2019

Respectfully submitted,

/s/ Steven E. Bizar
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CERTIFICATION

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Date: October 21, 2019

/s/ Tiffany E. Engsell
Tiffany E. Engsell (Pa. 320711)

CERTIFICATE OF SERVICE

I, Tiffany E. Engsell, hereby certify that on October 21, 2019, I caused a true and correct copy of the foregoing document titled Petitioners' Amended Witness and Exhibit Lists and Statement on Anticipated Duration for Preliminary Injunction Hearing to be served via electronic filing to all counsel of record.

Date: October 21, 2019

/s/ Tiffany E. Engsell

Tiffany E. Engsell (Pa. 320711)