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Counsel for Petitioners

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**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

CAROL ANN CARTER; MONICA PARRILLA;  
REBECCA POYOUROW; WILLIAM TUNG; ROSEANNE  
MILAZZO; BURT SIEGEL; SUSAN CASSANELLI; LEE  
CASSANELLI; LYNN WACHMAN; MICHAEL  
GUTTMAN; MAYA FONKEU; BRADY HILL; MARY  
ELLEN BALCHUNIS; TOM DEWALL; STEPHANIE  
MCNULTY; and JANET FEMIN,

Petitioners,

v.

VERONICA DEGRAFFENREID, in her official capacity as  
the Acting Secretary of the Commonwealth of Pennsylvania;  
JESSICA MATHIS, in her official capacity as Director for  
the Pennsylvania Bureau of Election Services and Notaries,

Respondents.

No. 132 MD 2021

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**PETITIONERS' ANSWER TO THE APPLICATION TO INTERVENE BY  
THE PENNSYLVANIA REPUBLICAN PARTY, REPUBLICAN  
CANDIDATES, AND REPUBLICAN VOTERS**

By and through undersigned counsel, Petitioners file this Answer in

Opposition to the Application for Leave to Intervene (“Application”) filed by the Republican Party of Pennsylvania and Individual Republican Voters (the “Proposed Intervenors”). For the Court’s benefit, Petitioners have filed a separate memorandum in opposition to the Application in narrative format. Petitioners nonetheless respond here to the numbered paragraphs of the original Application.

1. Admitted.

2. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 2 and on that basis deny them.

3. Admitted in part; denied in part. Petitioners admit Mr. Torres was the Republican nominee for the U.S. House of Representatives for Pennsylvania’s Second Congressional District in 2020. Petitioners are otherwise without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 3 and on that basis deny them.

4. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 4 and on that basis deny them.

5. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 5 and on that basis deny them.

6. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 6 and on that basis deny them.

7. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 7 and on that basis deny them.

8. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 8 and on that basis deny them.

9. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 9 and on that basis deny them.

10. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 10 and on that basis deny them.

11. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 11 and on that basis deny them.

12. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations

in Paragraph 12 and on that basis deny them.

13. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 13 and on that basis deny them.

14. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 14 and on that basis deny them.

15. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 15 and on that basis deny them.

16. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 16 and on that basis deny them.

17. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 17 and on that basis deny them.

18. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 18 and on that basis deny them.

19. After reasonable investigation, Petitioners are without knowledge or

information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 19 and on that basis deny them.

20. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 20 and on that basis deny them.

21. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 21 and on that basis deny them.

22. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 22 and on that basis deny them.

23. Admitted in part; denied in part. Petitioners admit Mr. Metcalfe is the Representative for Pennsylvania's 12th Legislative District. Petitioners are otherwise without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 23 and on that basis deny them.

24. Admitted in part; denied in part. Petitioners admit Mr. Negron was the Republican nominee for Pennsylvania's Eighteenth Congressional District in 2020. Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 24 and on that basis deny them.

25. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 25 and on that basis deny them.

26. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 26 and on that basis deny them.

27. Admitted in part; denied in part. Petitioners admit Mr. Harvey was the Republican nominee for the U.S. House of Representatives for Pennsylvania's Third Congressional District in 2020. Petitioners are otherwise without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 27 and on that basis deny them.

28. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 28 and on that basis deny them.

29. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 28 and on that basis deny them.

30. Admitted in part; denied in part. Petitioners admit that some of the Proposed Intervenors have previously been congressional candidates. Petitioners are without otherwise knowledge or information sufficient to form a belief as to

the truth or falsity of the allegations in Paragraph 30 and on that basis deny them.

31. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 31 and on that basis deny them.

32. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 32 and on that basis deny them.

33. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 33 and on that basis deny them.

34. This paragraph contains legal conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

35. This paragraph contains legal conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

36. This paragraph contains legal conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

37. This paragraph contains legal conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

38. This paragraph contains legal conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

39. This paragraph contains legal conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

40. This paragraph contains legal conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

41. This paragraph contains legal conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

42. This paragraph contains legal conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

43. This paragraph contains legal conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

44. Admitted in part; denied in part. Petitioners admit Pennsylvania courts have previously permitted the Republican Party of Pennsylvania and Republican voters to intervene in litigation. Petitioners deny this fact means the Proposed Intervenors are proper intervenors in this litigation.

45. This paragraph contains no factual averments to which a response is required. To the extent a response is required, Petitioners deny the allegations.

46. Admitted in part; denied in part. Petitioners admit that more than 3,000,000 Pennsylvanians are registered Republicans. Paragraph 46 otherwise contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the



allegations.

47. Admitted in part; denied in part. Petitioners admit that they are registered Pennsylvania voters. Petitioners otherwise respond that their Petition speaks for itself. Petitioners deny each other or different allegation.

48. In response to Paragraph 48, Petitioners state that their Petition speaks for itself. Petitioners deny each other or different allegation.

49. Admitted in part; denied in part. Petitioners admit that some data used for redistricting is anticipated to be released in September 2021. Petitioners deny the implication that all data used for redistricting will not be released until September 2021.

50. In response to Paragraph 50, Petitioners state that their Petition speaks for itself. Petitioners deny each other or different allegation.

51. In response to Paragraph 51, Petitioners state that their Petition speaks for itself. Petitioners deny each other or different allegation.

52. In response to Paragraph 52, Petitioners state that their Petition speaks for itself. Petitioners deny each other or different allegation.

53. In response to Paragraph 53, Petitioners state that their Petition speaks for itself. Petitioners deny each other or different allegation.

54. In response to Paragraph 54, Petitioners state that their Petition speaks for itself. Petitioners deny each other or different allegation.

55. In response to Paragraph 55, Petitioners state that their Petition speaks for itself. Petitioners deny each other or different allegation.

56. In response to Paragraph 56, Petitioners state that their Petition speaks for itself. Petitioners deny each other or different allegation.

57. Paragraph 57 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

58. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 58 and on that basis deny them.

59. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 59 and on that basis deny them.

60. Paragraph 60 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

61. Admitted.

62. Paragraph 62 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

63. Paragraph 63 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

64. Paragraph 64 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

65. Paragraph 65 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

66. Paragraph 66 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

67. Paragraph 67 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

68. Paragraph 68 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

69. Admitted in part; denied in part. Petitioners admit that some Proposed Intervenors are previous congressional candidates. Petitioners are otherwise

without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 69 and on that basis deny them.

70. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 70 and on that basis deny them.

71. Paragraph 71 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

72. Paragraph 72 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

73. Paragraph 73 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

74. Paragraph 74 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

75. Paragraph 75 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

76. Paragraph 76 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

77. Paragraph 77 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

78. Paragraph 78 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

79. Paragraph 79 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

80. Paragraph 80 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

81. Paragraph 81 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

82. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations

in Paragraph 82 and on that basis deny them.

83. Paragraph 83 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

84. Paragraph 84 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

85. Paragraph 85 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

86. Paragraph 86 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

87. Paragraph 87 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

88. Paragraph 88 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

89. Paragraph 89 contains mere characterizations and conclusions to

which no response is required. To the extent a response is required, Petitioners deny the allegations.

90. Paragraph 90 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

91. Paragraph 91 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

92. In response to Paragraph 92, Petitioners state that their Petition speaks for itself. Petitioners deny each other or different allegation.

93. Paragraph 93 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

94. Paragraph 94 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

95. Paragraph 95 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

96. After reasonable investigation, Petitioners are without knowledge or

information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 96 and on that basis deny them.

97. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 97 and on that basis deny them.

98. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 98 and on that basis deny them.

99. Paragraph 99 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

100. Admitted in part; denied in part. Petitioners admit that they are registered Pennsylvania voters. Petitioners otherwise respond that their Petition speaks for itself. Petitioners deny each other or different allegation.

101. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 101 and on that basis deny them. Paragraph 101 otherwise contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.



102. Paragraph 102 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

103. Paragraph 103 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

104. Paragraph 104 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

105. Paragraph 105 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

106. Paragraph 106 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

107. Paragraph 107 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

108. Paragraph 108 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is

required, Petitioners deny the allegations.

109. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 109 and on that basis deny them.

110. After reasonable investigation, Petitioners are without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 110 and on that basis deny them.

111. Paragraph 111 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

112. Paragraph 112 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

113. Paragraph 113 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

114. Paragraph 114 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

115. Paragraph 115 contains mere characterizations and conclusions to

which no response is required. To the extent a response is required, Petitioners deny the allegations.

116. Paragraph 116 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

117. Paragraph 117 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

118. Paragraph 118 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

119. Paragraph 119 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

120. To the extent the allegations in Paragraph 120 quotes from or refers to information on a Commonwealth website, the content of that website speaks for itself. Paragraph 120 otherwise contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

121. Paragraph 121 contains mere characterizations, legal contentions,

and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

122. Paragraph 123 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

123. Paragraph 124 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

124. Admitted in part; denied in part. Petitioners admit they filed their Petition for Review on April 26, 2021. Paragraph 124 otherwise contains mere characterizations to which no response is required.

125. Paragraph 125 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

126. Paragraph 126 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

127. Paragraph 127 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

128. Paragraph 128 contains mere characterizations and conclusions to which no response is required. To the extent a response is required, Petitioners deny the allegations.

Dated: June 17, 2021

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Respectfully submitted,

/s/ Edward D. Rogers

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**CERTIFICATE OF COMPLIANCE**

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

Submitted by: Edward D. Rogers

Signature: /s/ Edward D. Rogers

Name: Edward D. Rogers

Attorney No.: 69337

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**CERTIFICATE OF SERVICE**

I hereby certify that on the date set forth below, I caused the foregoing Answer to be served upon the following parties and in the manner indicated below, which service satisfies the requirements of Pa. R.A.P. 121:

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All counsel of record

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Bryan Cutler and Kerry Benninghoff*

Dated: June 17, 2021

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