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**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

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Carol Ann Carter, Monica Parrilla, : **CASES CONSOLIDATED**  
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 Temin, :  
Petitioners :

v. : No. 464 M.D. 2021

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 :

Philip T. Gressman; Ron Y. Donagi; :  
Kristopher R. Tapp; Pamela Gorkin; :  
David P. Marsh; James L. :  
Rosenberger; Amy Myers; Eugene :  
Boman; Gary Gordon; Liz McMahan; :  
Timothy G. Feeman; and Garth Isaak, :  
Petitioners :

v. : No. 465 M.D. 2021

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 :  
:

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Bureau of Election Services and :  
Notaries, :  
Respondents

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**CARTER PETITIONERS' RESPONSE TO THE APPLICATION TO  
INTERVENE FILED BY GOVERNOR WOLF**

Pursuant to this Court's scheduling order, the *Carter* Petitioners hereby respond to the application to intervene filed by Tom Wolf, Governor of the Commonwealth of Pennsylvania. The *Carter* Petitioners take no position on Governor Wolf's application. They do, however, note that if the Court is inclined to allow any Pennsylvania legislators to intervene, then it should similarly allow the intervention of Pennsylvania's Governor, who, unlike the legislators seeking intervention before this Court, has not yet had an opportunity to participate in the redistricting process in another forum and represents the entire branch of government he purports to represent.

Dated: January 4, 2022

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Respectfully submitted,

/s/ Edward D. Rogers  
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Marcel S. Pratt, No. 307483  
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\* *pro hac vice* forthcoming

**CERTIFICATE OF SERVICE**

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

By first class mail:

Kathleen Kotula  
401 North Street, Room 301  
Harrisburg, PA 17120-0500

By PACFile eService:

All counsel of record as set forth in the PACFile proof of service filed herewith

Dated: January 4, 2022

*/s/ Edward D. Rogers*  
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**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

Carol Ann Carter, Monica Parrilla, : 464 MD 2021  
Rebecca Poyourow, William Tung, : 465 MD 2021  
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 Temin,  
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

**PROOF OF SERVICE**

I hereby certify that this 4th day of January, 2022, I have served the attached document(s) to the persons on the date(s)  
and in the manner(s) stated below, which service satisfies the requirements of Pa.R.A.P. 121:

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

(Continued)

**Service**

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225 Fifth Avenue  
Pittsburgh, PA 15222  
412--28-8-3091  
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Representing: Petitioner Amy Myers  
Petitioner Amy Myers  
Petitioner David P. Marsh  
Petitioner David P. Marsh  
Petitioner Eugene Boman  
Petitioner Eugene Boman  
Petitioner Garth Isaak  
Petitioner Garth Isaak  
Petitioner Gary Gordon  
Petitioner Gary Gordon  
Petitioner James L. Rosenberger  
Petitioner James L. Rosenberger  
Petitioner Kristopher R. Tapp  
Petitioner Kristopher R. Tapp  
Petitioner Liz McMahon  
Petitioner Liz McMahon  
Petitioner Pamela Gorkin  
Petitioner Pamela Gorkin  
Petitioner Philip T. Gressman  
Petitioner Philip T. Gressman  
Petitioner Ron Y. Donagi  
Petitioner Ron Y. Donagi  
Petitioner Timothy G. Feeman  
Petitioner Timothy G. Feeman

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

*(Continued)*

Served: John Brent Hill  
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27th Floor  
Philadelphia, PA 19103  
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Representing: Respondent Degraffenreid, Veronica  
Respondent Jessica Mathis  
Respondent Jessica Mathis  
Respondent Veronica Degraffenreid

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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

(Continued)

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Petitioner Amy Myers  
Petitioner David P. Marsh  
Petitioner David P. Marsh  
Petitioner Eugene Boman  
Petitioner Eugene Boman  
Petitioner Garth Isaak  
Petitioner Garth Isaak  
Petitioner Gary Gordon  
Petitioner Gary Gordon  
Petitioner James L. Rosenberger  
Petitioner James L. Rosenberger  
Petitioner Kristopher R. Tapp  
Petitioner Kristopher R. Tapp  
Petitioner Liz McMahon  
Petitioner Liz McMahon  
Petitioner Pamela Gorkin  
Petitioner Pamela Gorkin  
Petitioner Philip T. Gressman  
Petitioner Philip T. Gressman  
Petitioner Ron Y. Donagi  
Petitioner Ron Y. Donagi  
Petitioner Timothy G. Feeman  
Petitioner Timothy G. Feeman



IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

*(Continued)*

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Representing: Respondent Degraffenreid, Veronica  
Respondent Jessica Mathis  
Respondent Jessica Mathis  
Possible Intervenor Tom Wolf  
Possible Intervenor Tom Wolf  
Respondent Veronica Degraffenreid

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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

(Continued)

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Representing: Petitioner Amy Myers  
Petitioner Amy Myers  
Petitioner David P. Marsh  
Petitioner David P. Marsh  
Petitioner Eugene Boman  
Petitioner Eugene Boman  
Petitioner Garth Isaak  
Petitioner Garth Isaak  
Petitioner Gary Gordon  
Petitioner Gary Gordon  
Petitioner James L. Rosenberger  
Petitioner James L. Rosenberger  
Petitioner Kristopher R. Tapp  
Petitioner Kristopher R. Tapp  
Petitioner Liz McMahon  
Petitioner Liz McMahon  
Petitioner Pamela Gorkin  
Petitioner Pamela Gorkin  
Petitioner Philip T. Gressman  
Petitioner Philip T. Gressman  
Petitioner Ron Y. Donagi  
Petitioner Ron Y. Donagi  
Petitioner Timothy G. Feeman  
Petitioner Timothy G. Feeman

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

*(Continued)*

**Courtesy Copy**

Served: Anthony Richard Holtzman  
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Service Date: 1/4/2022  
Address: K&L Gates LLP  
17 N. Second Street, 18th Floor  
Harrisburg, PA 17101  
Phone: 717--23-1-4500  
Representing: Possible Intervenor Jake Corman  
Possible Intervenor Jake Corman  
Possible Intervenor Kim Ward  
Possible Intervenor Kim Ward

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(Continued)

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Service Date: 1/4/2022  
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Philadelphia, PA 19103  
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Representing: Possible Intervenor Barbara Hill  
Possible Intervenor Barbara Hill  
Possible Intervenor Cynthia Alvarado  
Possible Intervenor Cynthia Alvarado  
Possible Intervenor Jodi Greene  
Possible Intervenor Jodi Greene  
Possible Intervenor John Thompson  
Possible Intervenor John Thompson  
Possible Intervenor Judy Hines  
Possible Intervenor Judy Hines  
Possible Intervenor Khalif Ali  
Possible Intervenor Khalif Ali  
Possible Intervenor Maryn Formley  
Possible Intervenor Maryn Formley  
Possible Intervenor Patrick Beaty  
Possible Intervenor Patrick Beaty  
Possible Intervenor Richard Rafferty  
Possible Intervenor Richard Rafferty  
Possible Intervenor Susan Gobreski  
Possible Intervenor Susan Gobreski  
Possible Intervenor Timothy L. Kauffman  
Possible Intervenor Timothy L. Kauffman

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

(Continued)

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Email: cwoods@woodslawoffices.com  
Service Date: 1/4/2022  
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301 Grant Street  
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Phone: 412-345-3198  
Representing: Possible Intervenor Amanda Cappelletti  
Possible Intervenor Amanda Cappelletti  
Possible Intervenor Art Haywood  
Possible Intervenor Art Haywood  
Possible Intervenor Carolyn Comitta  
Possible Intervenor Carolyn Comitta  
Possible Intervenor Christine Tartaglione  
Possible Intervenor Christine Tartaglione  
Possible Intervenor James Brewster  
Possible Intervenor James Brewster  
Possible Intervenor Jay Costa  
Possible Intervenor Jay Costa  
Possible Intervenor John Kane  
Possible Intervenor John Kane  
Possible Intervenor Judy Schwank  
Possible Intervenor Judy Schwank  
Possible Intervenor Lindsey Williams  
Possible Intervenor Lindsey Williams  
Possible Intervenor Lisa Boscola  
Possible Intervenor Lisa Boscola  
Possible Intervenor Marty Flynn  
Possible Intervenor Marty Flynn  
Possible Intervenor Nikil Saval  
Possible Intervenor Nikil Saval  
Possible Intervenor Steve Santarsiero  
Possible Intervenor Steve Santarsiero  
Possible Intervenor Tim Kearney  
Possible Intervenor Tim Kearney  
Possible Intervenor Vincent Hughes  
Possible Intervenor Vincent Hughes  
Possible Intervenor Wayne Fontana  
Possible Intervenor Wayne Fontana

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

*(Continued)*

Served: Jeffry William Duffy  
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Service Date: 1/4/2022  
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Phone: 215--56-4-2916  
Representing: Possible Intervenor Bryan Cutler  
Possible Intervenor Bryan Cutler  
Possible Intervenor Kerry Benninghoff  
Possible Intervenor Kerry Benninghoff

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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

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Served: John P. Lavelle Jr.  
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Service Date: 1/4/2022  
Address: Morgan, Lewis & Bockius LLP  
1701 Market Street  
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Phone: 215-963-4824  
Representing: Possible Intervenor Adam Dusen  
Possible Intervenor Adam Dusen  
Possible Intervenor Athan Biss  
Possible Intervenor Athan Biss  
Possible Intervenor Daniel Mallinson  
Possible Intervenor Daniel Mallinson  
Possible Intervenor Jean Handley  
Possible Intervenor Jean Handley  
Possible Intervenor Jeffrey Cooper  
Possible Intervenor Jeffrey Cooper  
Possible Intervenor Jesse Stowell  
Possible Intervenor Jesse Stowell  
Possible Intervenor Joseph Amodei  
Possible Intervenor Joseph Amodei  
Possible Intervenor Kyle Hynes  
Possible Intervenor Kyle Hynes  
Possible Intervenor Michael Skros  
Possible Intervenor Michael Skros  
Possible Intervenor Mike Walsh  
Possible Intervenor Mike Walsh  
Possible Intervenor Myra Forrest  
Possible Intervenor Myra Forrest  
Possible Intervenor Priscilla McNulty  
Possible Intervenor Priscilla McNulty  
Possible Intervenor Rick Bryant  
Possible Intervenor Rick Bryant  
Possible Intervenor Sandra Strauss  
Possible Intervenor Sandra Strauss  
Possible Intervenor Sara Stroman  
Possible Intervenor Sara Stroman  
Possible Intervenor Susan Wood  
Possible Intervenor Susan Wood

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

(Continued)

Served: Joshua John Voss  
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Service Date: 1/4/2022  
Address: Three Logan Sqaure, 5th Floor  
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Representing: Possible Intervenor Bud Shuster  
Possible Intervenor Guy Reschenthaler  
Possible Intervenor Jeffrey Varner  
Possible Intervenor Ryan Costello  
Possible Intervenor Tom Marino

Served: Kathleen A. Gallagher  
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Pittsburgh, PA 15219  
Phone: 412-717-1900  
Representing: Possible Intervenor Haroon Bashir  
Possible Intervenor Haroon Bashir  
Possible Intervenor Jeffrey Wenk  
Possible Intervenor Jeffrey Wenk  
Possible Intervenor Tegwyn Hughes  
Possible Intervenor Tegwyn Hughes  
Possible Intervenor Valerie Biancaniello  
Possible Intervenor Valerie Biancaniello

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Other Kathleen Kotula



IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

*(Continued)*

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Representing: Possible Intervenor Anthony H. Williams  
Possible Intervenor Anthony H. Williams  
Possible Intervenor Katie J. Muth  
Possible Intervenor Katie J. Muth  
Possible Intervenor Maria Collett  
Possible Intervenor Maria Collett  
Possible Intervenor Sharif Street  
Possible Intervenor Sharif Street

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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

(Continued)

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Representing: Possible Intervenor Amanda Cappelletti  
Possible Intervenor Amanda Cappelletti  
Possible Intervenor Art Haywood  
Possible Intervenor Art Haywood  
Possible Intervenor Carolyn Comitta  
Possible Intervenor Carolyn Comitta  
Possible Intervenor Christine Tartaglione  
Possible Intervenor Christine Tartaglione  
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Possible Intervenor James Brewster  
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Possible Intervenor Nikil Saval  
Possible Intervenor Nikil Saval  
Possible Intervenor Steve Santarsiero  
Possible Intervenor Steve Santarsiero  
Possible Intervenor Tim Kearney  
Possible Intervenor Tim Kearney  
Possible Intervenor Vincent Hughes  
Possible Intervenor Vincent Hughes  
Possible Intervenor Wayne Fontana  
Possible Intervenor Wayne Fontana

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

(Continued)

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Possible Intervenor Bud Shuster  
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Possible Intervenor Guy Reschenthaler  
Possible Intervenor Jeffrey Varner  
Possible Intervenor Jeffrey Varner  
Possible Intervenor Ryan Costello  
Possible Intervenor Ryan Costello  
Possible Intervenor Tom Marino  
Possible Intervenor Tom Marino

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Phone: 717--78-7-3002  
Representing: Possible Intervenor Joanna McClinton  
Possible Intervenor Joanna McClinton

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

*(Continued)*

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Representing: Possible Intervenor Bud Shuster  
Possible Intervenor Guy Reschenthaler  
Possible Intervenor Jeffrey Varner  
Possible Intervenor Ryan Costello  
Possible Intervenor Tom Marino

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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

*(Continued)*

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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

(Continued)

Representing:

Possible Intervenor Anthony Luther  
Possible Intervenor Anthony Luther  
Possible Intervenor Brandy Reep  
Possible Intervenor Brandy Reep  
Possible Intervenor Candee Barnes  
Possible Intervenor David Ball  
Possible Intervenor David Ball  
Possible Intervenor Evan Smith  
Possible Intervenor Evan Smith  
Possible Intervenor James Foreman  
Possible Intervenor James Foreman  
Possible Intervenor James Thompson  
Possible Intervenor James Thompson  
Possible Intervenor James Vasilko  
Possible Intervenor James Vasilko  
Possible Intervenor Jay Hagerman  
Possible Intervenor Jay Hagerman  
Possible Intervenor Jeffrey Piccola  
Possible Intervenor Jeffrey Piccola  
Possible Intervenor Joseph Renwick  
Possible Intervenor Joseph Renwick  
Possible Intervenor Justin Behrens  
Possible Intervenor Justin Behrens  
Possible Intervenor Kenneth Lunsford  
Possible Intervenor Kenneth Lunsford  
Possible Intervenor Kim Geyer  
Possible Intervenor Kristine Eng  
Possible Intervenor Kristine Eng  
Possible Intervenor Leslie Oshe  
Possible Intervenor Leslie Oshe  
Possible Intervenor Linda Daniels  
Possible Intervenor Linda Daniels  
Possible Intervenor Louis Capozzi  
Possible Intervenor Louis Capozzi  
Possible Intervenor Mary Owlett  
Possible Intervenor Mary Owlett  
Possible Intervenor Matthew Stuckey  
Possible Intervenor Matthew Stuckey  
Possible Intervenor Michael Slupe  
Possible Intervenor Michael Slupe  
Possible Intervenor Pamela Thompson  
Possible Intervenor Pamela Thompson  
Possible Intervenor Richard Rafferty

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

*(Continued)*

Representing: Possible Intervenor Stephanie Renwick  
Possible Intervenor Stephanie Renwick  
Possible Intervenor Tammy Lunsford  
Possible Intervenor Tammy Lunsford  
Possible Intervenor Thomas Reed  
Possible Intervenor Thomas Reep

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**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

/s/ Edward David Rogers

*(Signature of Person Serving)*

Person Serving: Rogers, Edward David  
Attorney Registration No: 069337  
Law Firm: Ballard Spahr, LLP  
Address: Ballard Spahr Llp  
1735 Market St Fl 51  
Philadelphia, PA 191037599  
Representing: Petitioner Balchunis, Mary Ellen  
Petitioner Boman, Eugene  
Petitioner Carter, Carol Ann  
Petitioner Cassanelli, Lee  
Petitioner Cassanelli, Susan  
Petitioner DeWall, Tom  
Petitioner Donagi, Ron Y.  
Petitioner Feeman, Timothy G.  
Petitioner Fonkeu, Maya  
Petitioner Gordon, Gary  
Petitioner Gorkin, Pamela  
Petitioner Gressman, Philip J.  
Petitioner Guttman, Michael  
Petitioner Hill, Brady  
Petitioner Isaak, Garth  
Petitioner Marsh, David P.  
Petitioner McMahon, Liz  
Petitioner McNulty, Stephanie  
Petitioner Milazzo, Roseanne  
Petitioner Myers, Amy  
Petitioner Parrilla, Monica  
Petitioner Poyourow, Rebecca  
Petitioner Rosenberger, James L.  
Petitioner Siegel, Burt  
Petitioner Tapp, Kristopher R.  
Petitioner Temin, Janet  
Petitioner Tung, William  
Petitioner Wachman, Lynn