

Uzoma N. Nkwonta*
David R. Fox*
Richard A. Medina*
ELIAS LAW GROUP LLP
10 G St. NE, Suite 600
Washington, D.C. 20002
Telephone: (202) 968-4490
unkwonta@elias.law
dfox@elias.law
rmedina@elias.law

Adam C. Bonin
THE LAW OFFICE OF ADAM C. BONIN
121 South Broad Street, Suite 400
Philadelphia, PA 19107
Telephone: (267) 242-5014
Facsimile: (215) 827-5300
adam@boninlaw.com

**Motions for Admission Pro Hac Vice Forthcoming*

*Attorneys for Proposed Intervenor-Defendant
Pennsylvania Alliance for Retired Americans*

**IN THE COURT OF COMMON PLEAS
OF CHESTER COUNTY, PENNSYLVANIA**

CIVIL DIVISION

JAMES C. ROMINE, DARYL CAMPBELL,
SANDRA LYNN BOWMAN, AND WILLIAM
REID BORTON,

Plaintiffs,

v.

CHESTER COUNTY BOARD OF ELECTIONS,
KAREN BARSOUM, in her official capacity,
MARIAN MOSKOWITZ, in her official capacity,
JOSH MAXWELL, in his official, and MICHELLE
KICHLINE, in her official,

Defendants.

Case No. 2022-07093-IR

APPLICATION OF PENNSYLVANIA ALLIANCE FOR RETIRED AMERICANS FOR LEAVE TO INTERVENE

The Pennsylvania Alliance for Retired Americans (the “Alliance”) submits this Application for Leave to Intervene as co-Defendant in the above-captioned action pursuant to Pennsylvania Rule of Civil Procedure 2326 *et seq.*

INTRODUCTION

1. Voters in Chester County rely on secure, accessible drop boxes to exercise their right to vote by mail or absentee ballot (collectively referred to here as “mail ballots”). Opportunities to submit mail ballots are especially important for retired voters, who often face significant barriers to voting in person.

2. Plaintiffs seek to co-opt the authority of the Chester County Board of Elections to administer elections by asking this Court to adopt and enforce Plaintiffs’ own preferred drop box policies. Specifically, Plaintiffs request an injunction that would force the Board to eliminate twenty-four hour drop boxes and require the Board to incur the expense of redirecting its personnel from assisting voters to physically monitoring all drop boxes in the County.

3. If adopted, Plaintiffs’ proposed restrictions could be ruinous for the Alliance and its members. The Alliance is a nonprofit organization that counts among its members hundreds of thousands of retired voters in the Commonwealth of Pennsylvania, including in Chester County. Plaintiffs’ requested relief would undermine the Alliance’s mission of ensuring that seniors are civically and politically engaged by making it harder—in some cases, prohibitively so—for the Alliance’s members to vote.

4. The Alliance seeks intervention in this suit to ensure that its members, and all Chester County voters, have the opportunity to safely cast a ballot using drop boxes in upcoming elections.

PROPOSED INTERVENOR

5. The Alliance is a 501(c)(4) nonprofit, social welfare organization serving and representing over 335,000 members in the Commonwealth of Pennsylvania, including in Chester County. Its membership is composed of retirees, most of whom are over the age of 65, from public and private sector unions; community organizations; and individual activists. The Alliance is a chartered state affiliate of the Alliance for Retired Americans, which is one of the country's leading grassroots senior organizations and engages in important political efforts to protect and preserve programs vital to the health and economic security of older Americans.

6. The Alliance's mission is to ensure social and economic justice and to protect the civil rights of retirees after a lifetime of work. Plaintiffs' requested removal of voting opportunities threatens the Alliance's efforts to ensure its members have adequate access to the franchise. As such, the Alliance has a distinct interest in Chester County's election processes. That interest encompasses procedures affecting the delivery and submission of mail ballots, including the availability of drop boxes.

7. Many of the Alliance's members reside in Chester County; some will inevitably vote by depositing their mail ballot in a drop box, and not all are able to do so between the hours of 9 a.m. and 6 p.m. For example, some retired voters may rely on transportation from friends or family members who are only available outside of regular business hours, especially given the limited public transit and rideshare options in more rural parts of the County. Plaintiffs' requested relief would imperil the right to vote of the Alliance's members who rely on accessible drop boxes—as voters over the age of 65 are especially likely to, given their disproportionate use of mail ballots.

8. Furthermore, if Plaintiffs' requested relief is granted, the Alliance would need to divert its limited resources to combat these harms, such as by shifting staff time and funds away

from other projects to devising and executing plans to educate the Alliance’s membership about the limited drop box availability and other (more burdensome) alternatives for submitting mail ballots.

FACTUAL AND PROCEDURAL BACKGROUND

9. This litigation was initiated on September 15, 2022, by the filing of a “Complaint in Equity and Mandamus” (the “Complaint”).

10. Plaintiffs—four residents of Chester County who allege an intention to vote in the November 8, 2022 general election—seek an order enjoining the Chester County Board of Elections and county elections officials from using drop boxes unless the drop boxes are physically monitored in-person. Compl. ¶¶ 1-4 & p. 13.

11. In previous elections, Chester County offered thirteen drop boxes. Two drop boxes were available 24 hours, 7 days a week. The remaining eleven drop boxes were only accessible between 9 a.m. to 6 p.m. from Monday through Friday, and from 10 a.m. to 2 p.m. on Saturday and Sunday.

12. The Alliance files this application for intervention to prevent the potential harm to its mission that would result from Plaintiffs’ proposed restrictions, and to protect the rights of its members. Defendants have yet to respond to the Complaint, and no other substantive filings or court proceedings have occurred in this case to date.

LEGAL STANDARD AND ANALYSIS

13. Pennsylvania Rule of Civil Procedure 2327 allows a person not named as a party in an action to seek leave to intervene by filing an application with the court.

14. That Rule states, in pertinent part:

At any time during the pendency of an action, a person not a party thereto shall be permitted to intervene therein, subject to these rules if . . .

(4) the determination of such action may affect any legally enforceable interest of such person whether or not such person may be bound by a judgment in the action.

Pa. R.C.P. 2327.

15. The Alliance meets the requirements for intervention under Pennsylvania Rule of Civil Procedure 2327(4) because its “interests may be affected by a judgment.” *Appeal of Austerlitz*, 63 Pa. Cmwlth. 140, 142, 437 A.2d 804, 805 (1981) (citing Pa. R.C.P. No. 2327(4)).

16. As a federal court in Pennsylvania recognized just two years ago by granting intervention to the Alliance in a similar challenge to “unmanned” drop boxes, the Alliance has a keen interest in protecting its members’ ability to use drop boxes to the full extent that county boards intend to offer them. *See Order, Donald J. Trump for President, Inc. v. Boockvar*, 2:20-cv-00966-NR, ECF No. 309 (W.D. Pa. Aug. 3, 2020).

17. A legal requirement that drop-boxes be physically staffed at all times would effectively eliminate the 24-hour drop boxes that Chester County voters—particularly its retired voters including the Alliance’s members—have come to rely upon. It would be infeasible for county election officials to staff drop boxes outside of business hours—let alone on a 24-hour basis.

18. Accessible drop-boxes facilitate the use of mail ballots during the COVID-19 pandemic and provide safeguards that are necessary to protect against disenfranchisement. Drop boxes are critical for voters—including the Alliance’s members and constituents—who are unable to vote in person because of disability, scheduling conflicts, lack of transportation, or other hardship, and who cast their ballot too late to rely on postal delivery. It is critical that these drop boxes be available outside of regular business hours because many of the same obstacles that prevent voters from casting a ballot in person often prevent them from depositing a mail ballot during business hours.

19. Limiting the accessibility of drop boxes would undermine the Alliance's mission of ensuring that seniors are civically engaged and have a voice in shaping public policy. Plaintiffs' requested relief would also require the Alliance to redirect its limited resources from other programs to address the law's impact on its members who rely on drop boxes to vote. This will include diverting organizational resources away from existing programs to educate its members about the limited hours and accessibility of drop box locations, and assisting members in determining whether they remain able to vote via a drop box.

20. "[A] grant of intervention is mandatory where the intervenor satisfies one of the four bases set forth in Rule No. 2327 unless there exists a basis for refusal under Rule No. 2329." *Allegheny Reprod. Health Ctr. v. Pennsylvania Dep't of Hum. Servs.*, 225 A.3d 902, 908 (Pa. Cmwlth. 2020).

21. Pennsylvania Rule of Civil Procedure 2329 allows an application for intervention to be rejected only if: (1) the petitioner's claim or defense "is not in subordination to and in recognition of the propriety of the action"; (2) the petitioner's interest is already adequately represented; or (3) "the petitioner has unduly delayed in making application for intervention or the intervention will unduly delay, embarrass or prejudice the trial or the adjudication of the rights of the parties." None of these exceptions apply in this case.

22. The Alliance's defenses are in subordination to and in recognition of the propriety of the action.

23. The Alliance's interests are not adequately represented by Defendants, whose stake in this lawsuit is defined solely by their statutory duties to conduct elections.

24. Defendants are responsible for administering elections but do not represent the Alliance's interests in maintaining its current resource allocations or ensuring that retirees are able to vote by their method of choice.

25. Here, the Alliance seeks to ensure access to safe and reliable means to submit mail ballots, given the Alliance's members' advanced age and heightened vulnerability to COVID-19, and oppose any attempt to directly or indirectly limit ballot drop-off hours or locations. Defendants, on the other hand, may find that in the face of litigation, providing drop-off locations is not as essential a component of their duty to administer elections.

26. Where an original party to the suit is a government entity, whose position is "necessarily colored by its view of the public welfare rather than the more parochial views of a proposed intervenor whose interest is personal to it," the burden of establishing inadequacy of representation by existing parties is "comparatively light." *Kleissler v. U.S. Forest Serv.*, 157 F.3d 964, 972 (3d Cir. 1998) (citing *Conservation L. Found. v. Mosbacher*, 966 F.2d 39, 44 (1st Cir. 1992), and *Mausolf v. Babbitt*, 85 F.3d 1295, 1303 (8th Cir. 1996)); see also *D.G.A. v. Dep't of Human Servs.*, No. 1059 C.D. 2018, 2020 WL 283885, at *7 (Pa. Cmwlth. Jan. 21, 2020) (reversing denial of intervention where intervenors were aligned with the government's litigation position but possessed unique and personal interests not adequately represented by government respondents); *Larock v. Sugarloaf Twp. Zoning Hearing Bd.*, 740 A.2d 308, 314 (Pa. Cmwlth. 1999) (similar).

27. Finally, the Alliance has promptly applied to intervene and its intervention will neither delay the resolution of this matter nor prejudice any party. Plaintiffs filed their action approximately a week ago; Defendants have not filed a response, and the parties have yet to meaningfully litigate this case. The Alliance's participation will not unduly prejudice any party,

but rather will aid the Court in understanding the factual and legal issues involved. The Alliance will abide by the deadlines set by this Court.

28. Because the Alliance satisfies Pennsylvania Rule of Civil Procedure 2327 and none of the exceptions of Pennsylvania Rule of Civil Procedure 2329 apply, intervention *must* be granted.

29. Even if this Court were to find present any of the grounds for refusal of intervention enumerated in in Rule 2329, it can—and should—exercise its discretion to permit the Alliance to intervene for the reasons stated above. *MarkWest Liberty Midstream & Res., LLC v. Cecil Twp. Zoning Hearing Bd.*, No. 904 C.D. 2016, 2018 WL 357337, at *4 (Pa. Cmwlth. Jan. 11, 2018) (“A trial court’s determination of whether an application for intervention may be denied pursuant to [Rule] 2329 is discretionary.”).

CONCLUSION

30. For these reasons, the Alliance has a right to intervene in this case.

31. Pursuant to Pennsylvania Rule of Civil Procedure 2328, the Alliance is attaching a copy of the pleading that it will file in the action if permitted to intervene.

32. The Alliance requests a Hearing on this Application if deemed necessary.

WHEREFORE, the Alliance respectfully requests that this Honorable Court grant its Application to Intervene in this matter, and accept its Answer to Plaintiffs’ Complaint in Equity and Mandamus attached hereto as its first filing.

Dated: September 23, 2022

Respectfully submitted,

By: 

Adam C. Bonin
THE LAW OFFICE OF ADAM C. BONIN
121 South Broad Street, Suite 400
Philadelphia, PA 19107
Telephone: (267) 242-5014
Facsimile: (215) 827-5300
adam@boninlaw.com

Uzoma N. Nkwonta*
David R. Fox*
Richard A. Medina*
ELIAS LAW GROUP LLP
10 G St. NE, Suite 600
Washington, D.C. 20002
Telephone: (202) 968-4490
unkwonta@elias.law
dfox@elias.law
rmedina@elias.law

*Counsel for Proposed Intervenor
Pennsylvania Alliance for Retired
Americans*

**Motions for Admission Pro
Hac Vice Forthcoming*

Uzoma N. Nkwonta*
David R. Fox*
Richard A. Medina*
ELIAS LAW GROUP LLP
10 G St. NE, Suite 600
Washington, D.C. 20002
Telephone: (202) 968-4490
unkwonta@elias.law
dfox@elias.law
rmedina@elias.law

Adam C. Bonin
THE LAW OFFICE OF ADAM C. BONIN
121 South Broad Street, Suite 400
Philadelphia, PA 19107
Telephone: (267) 242-5014
Facsimile: (215) 827-5300
adam@boninlaw.com

**Motions for Admission Pro Hac Vice Forthcoming*

*Attorneys for Proposed Intervenor-Defendant
Pennsylvania Alliance for Retired Americans*

**IN THE COURT OF COMMON PLEAS
OF CHESTER COUNTY, PENNSYLVANIA**

CIVIL DIVISION

JAMES C. ROMINE, et al.,

Plaintiffs,

v.

CHESTER COUNTY BOARD OF ELECTIONS, et
al.,

Defendants.

Case No. 2022-07093-IR

PROPOSED INTERVENOR-DEFENDANT'S PRELIMINARY OBJECTIONS

The Pennsylvania Alliance for Retired Americans (the "Alliance") presents the following preliminary objections to Plaintiffs' Complaint in Equity and Mandamus pursuant to Pennsylvania Rule of Civil Procedure 1028.

INTRODUCTION

1. Plaintiffs—four Chester County voters—ask this Court to commandeer the Chester County Board of Elections and eliminate its discretion to implement and adjust ballot drop-box

policies on the eve of the November election, not because those policies are themselves unlawful but merely because Plaintiffs feel they do too little to prevent third parties from allegedly violating the law. Plaintiffs therefore demand that this Court issue a mandatory injunction or a writ of mandamus requiring the Board to monitor all of its drop boxes in person at all times when they are open for the delivery of ballots. There is no legal basis for Plaintiffs' belated demand, and it should be denied at the threshold. These are decisions which the General Assembly has committed to the Board of Elections' discretion.

FACTUAL AND PROCEDURAL BACKGROUND

2. Plaintiffs allege that, in the May 2022 primary election in Pennsylvania, the Chester County Board of Elections placed ballot drop boxes at 13 locations throughout the county. Compl. ¶ 22. Eleven of those drop boxes were accessible only from 9 a.m. to 6 p.m. on Monday through Friday, and from 10 a.m. to 2 p.m. on Saturday and Sunday. Those eleven drop boxes were "physically staffed," meaning that a County employee was physically present during the hours that the drop boxes were available. *Id.* ¶ 24. Chester County also offered two drop boxes that were available to voters 24 hours a day. *Id.* ¶ 26. These drop boxes, Plaintiffs allege, were not physically staffed and were instead monitored with security cameras. *Id.* ¶¶ 28-29.

3. Plaintiffs further allege that Defendants have provided bolded guidance instructing voters that absentee and mail ballots must be delivered in person or by mail, unless a voter is disabled or voting by emergency absentee ballot and both the voter and the person delivering the ballot has signed a written authorization. *Id.* ¶ 21. Despite these warnings, Plaintiffs allege, security footage shows that some voters deposited multiple ballots in those drop boxes. *Id.* ¶ 31.

4. Notably, Plaintiffs make no allegations about whether those voters who appear to have deposited multiple ballots possessed the required official written authorization allowing them to return another voter's ballot, and the video footage would not reveal whether that was so.

5. Dissatisfied with the procedures chosen by the County Board of Elections to ensure voters are complying with Pennsylvania election law, Plaintiffs brought this action on September 15, 2022 seeking to compel the Defendants to adopt their own preferred policies.

PRELIMINARY OBJECTION 1
PENNSYLVANIA RULE OF CIVIL PROCEDURE 1028(A)(4)
DEMURRER (LACHES)

6. The Alliance incorporates the foregoing paragraphs as if set forth at length herein.

7. Laches bars claims when there has been “(1) a delay arising from [petitioner’s] failure to exercise due diligence and (2) prejudice to the [opposing parties] resulting from the delay.” *Stilp v. Haver*, 718 A.2d 290, 293 (Pa. 1998) (citation omitted); *see also Holiday Lounge, Inc. v. Shaler Enters. Corp.*, 272 A.2d 175, 177 (Pa. 1971) (“[I]t is settled that laches may be raised and determined by preliminary objection.”). Both elements are met here.

8. *First*, according to their own allegations, Plaintiffs have known, or should have known, about Chester County’s use of “unstaffed” drop boxes since May 2022, when those drop boxes were utilized during the primary election. Compl. ¶¶ 22-27. But they waited until the mail voting process was already underway for the general election to bring this challenge, after thousands of County voters (including Alliance members) opted to request mail-in ballots with settled expectations as to drop box availability.

9. *Second*, the Alliance, the County Defendants, and Chester County’s voters have been prejudiced by Plaintiffs’ delay. “Prejudice may be found where there has been some change in the condition or relations of the parties which occurs during the period the complainant failed to act.” *Stilp*, 718 A.2d at 294.

10. Planning for the 2022 general election is well underway and requiring Defendants to change their plans at this late hour would be unduly prejudicial and unnecessarily expensive. More importantly, the voters of Chester County, including the Alliance’s members, have come to

rely upon the expectation that 24-hour drop boxes will be available. And, as the Complaint establishes, many voters *did* rely upon 24-hour drop boxes to cast a ballot as recently as the May 2022 primary.

11. A court-mandated change of the rules of the road in the middle of the voting process, after voters have already voted using 24-hour drop boxes during the primary election, and after voters have already requested mail ballots for the general election, will sow confusion and prevent some voters from casting their mail ballot.

12. Because Plaintiffs could have brought this action at any time since May 2022 but instead decided to unjustifiably delay, the action should be dismissed with prejudice under the equitable doctrine of laches.

PRELIMINARY OBJECTION 2
PENNSYLVANIA RULE OF CIVIL PROCEDURE 1028(A)(4)
DEMURRER (FAILURE TO STATE A CLAIM AS TO COUNT I)

13. Plaintiffs' Count I purports to seek "Injunctive Relief," but it fails to identify any basis for such relief. Plaintiffs do not cite any statute or other provision of law allegedly violated by Defendants. Instead, Plaintiffs merely recite the prerequisites for issuance of a preliminary injunction. Compl. ¶ 47. But a request for a preliminary injunction is not itself a cause of action. Rather, for a preliminary injunction to issue, Plaintiffs must first state a cognizable claim for relief. *E.g. Neel v. Allegheny Cnty. Memorial Park*, 137 A.2d 785, 787 (1958) (dissolving preliminary injunction where no cause of action was stated).

14. Among the "essential prerequisites" for obtaining a preliminary injunction is a showing "that the activity [the party] seeks to restrain is actionable, that its right to relief is clear, and that the wrong is manifest, or, in other words, must show that it is likely to prevail on the merits." *Warehime v. Warehime*, 860 A.2d 41, 46–47 (Pa. 2004). Plaintiffs make no allegation that Defendants' activity is "actionable" under any law, nor that Plaintiffs have any legal "right to

relief.” *Id.* Absent some underlying claim, such as an alleged violation of statutory or constitutional rights—and Plaintiffs allege none—Plaintiffs cannot be entitled to preliminary injunctive relief.

15. At best, Plaintiffs have alleged that some third parties may have violated the Election Code during the last election by returning other voters’ ballots to drop boxes. But they have failed to allege that *Defendants* have violated or will violate any state or federal statutory or constitutional provision. To the contrary, Plaintiffs allege that Defendants have posted signs making clear that it is generally impermissible for voters to return other voters’ ballots. Compl. ¶ 21. Plaintiffs simply allege that Defendants are not doing enough to prevent third parties from violating the election code. In the absence of any alleged legal violation by Defendants, there is no authority for Plaintiffs, as private citizens, to demand judicial imposition of their preferred policies by Defendants.

16. *Pierce v. Allegheny County Board of Elections*, 324 F. Supp. 2d 684 (W.D. Pa. 2003), which Plaintiffs cite for the proposition that injunctive relief is necessary to preserve any future challenge to void ballots, does not help them. In that case, the court found the Allegheny County Board of Elections (“Allegheny Board”) adopted three inconsistent policies regarding third-party delivery of absentee ballots, and that the Allegheny Board “failed to publish its three policies in a manner likely to notify the general public of its existing policies and policy changes.” *Id.* at 690. Additionally, two of the Allegheny Board’s three policies expressly violated the Election Code: the first allowed unrestricted third-party ballot delivery, despite the Election Code’s limitations, and the second prevented even authorized agents of disabled voters from delivering another person’s ballot. *Id.* at 689-90. Under those peculiar facts, the court ordered the Allegheny Board to set aside any ballots that were hand-delivered for later adjudication. *Id.* at 709.

17. The facts here as Plaintiffs allege them are much simpler. The Complaint alleges only that Defendants have adopted one policy limiting third-party ballot delivery to authorized agents; that policy perfectly tracks the Election Code's requirements; and the policy has been publicized without any confusion. Plaintiffs have therefore failed to allege that Defendants, as opposed to third parties, are violating any law.

18. Plaintiffs' request for preliminary injunctive relief also fails for a second reason. To obtain a preliminary injunction, Plaintiffs must show that the injunction will "restore the parties to their status as it existed immediately prior to the alleged wrongful conduct." *Id.* at 46. But the Plaintiffs affirmatively allege that without relief, Defendants will merely continue to do what they have done before. Compl. ¶ 40 ("Upon information and belief, the Board of Election intends to utilize the drop boxes in the same manner as it did for the 2022 primary election for the upcoming 2022 general election."). Thus, granting Plaintiffs requested injunction would improperly *change* the status quo, by requiring Defendants to alter their plans for offering drop boxes during the upcoming election.

19. Finally, while Plaintiffs discuss only the preliminary injunction standard, Count I would fare no better if they sought a permanent injunction. To obtain a permanent injunction, Plaintiffs must show a "clear legal right to relief." *Mazin v. Bureau of Pro. & Occupational Affs.*, 950 A.2d 382, 390 (Pa. Cmwlth. 2008). Plaintiffs make no such showing here, because they do not identify any statute, constitutional provision, or other legal cause of action that entitles them to relief.

PRELIMINARY OBJECTION 3
PENNSYLVANIA RULE OF CIVIL PROCEDURE 1028(A)(4)
DEMURRER (FAILURE TO STATE A CLAIM AS TO COUNT II)

20. Plaintiffs' second claim similarly fails. In Count II, Plaintiffs purport to bring an "Action in Mandamus" pursuant to Pa. R. Civ. P. 1091. But "[m]andamus will only lie to compel

official performance of a ministerial act or mandatory duty where there is a clear legal right in the plaintiff, a corresponding duty in the defendant, and a lack of any other adequate and appropriate remedy at law.” *Del. River Port Auth. v. Thornburgh*, 493 A.2d 1351, 1355 (Pa. 1985).

21. Plaintiffs have not identified any ministerial act or mandatory duty that Defendants are failing to engage in, so they cannot possibly be entitled to mandamus. Plaintiffs evidently desire that Defendants do more to prevent third parties from allegedly violating the Pennsylvania Election Code by returning multiple ballots. But preventing third parties from violating the law is not a ministerial act, and Defendants have not identified any source of law imposing a mandatory duty requiring Defendants to change their drop box policies.

22. Moreover, mandamus requires that there be a “clear legal right *in the plaintiff*” for relief. *Del. River Port Auth.*, 493 A.2d at 1355 (emphasis added). But Plaintiffs—four individual Chester County voters—do not identify any legal right specific to themselves that would require Defendants to change their policies to prevent other voters from allegedly violating the law. For that reason, as well, mandamus is unavailable.

Dated: September 23, 2022

Respectfully submitted,

By:  _____

Adam C. Bonin
THE LAW OFFICE OF ADAM C. BONIN
121 South Broad Street, Suite 400
Philadelphia, PA 19107
Telephone: (267) 242-5014
Facsimile: (215) 827-5300
adam@boninlaw.com

Uzoma N. Nkwonta*
David R. Fox*
Richard A. Medina*

ELIAS LAW GROUP LLP

10 G St. NE, Suite 600

Washington, D.C. 20002

Telephone: (202) 968-4490

unkwonta@elias.law

dfox@elias.law

rmedina@elias.law

*Counsel for Proposed Intervenor
Pennsylvania Alliance for Retired
Americans*

**Motions for Admission Pro
Hac Vice Forthcoming*

RETRIEVED FROM DEMOCRACYDOCKET.COM