

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

REPUBLICAN NATIONAL	:	No. 447 MD 2022
COMMITTEE, <i>et al.</i> ,	:	
Petitioners,	:	
	:	
v.	:	
	:	
LEIGH M. CHAPMAN, <i>et al.</i> ,	:	
Respondents.	:	
	:	

On this ____ day of _____, 2022, upon consideration of Petitioners' Application for Special Relief in the Form of a Preliminary Injunction, and Respondents' Opposition thereto, it is hereby

ORDERED AND DECREED that the Application is denied.

By: _____

J.

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CITY OF PHILADELPHIA LAW DEPARTMENT

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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

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COMMITTEE, *et al.*,

Petitioners,

v.

LEIGH M. CHAPMAN, *et al.*,

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No. 447 MD 2022

**RESPONDENT PHILADELPHIA COUNTY BOARD OF ELECTIONS’
ANSWER TO PETITIONERS’ APPLICATION FOR
PRELIMINARY INJUNCTION**

The Court should deny the Application because Petitioners’ Application is inexcusably late and fails the traditional, multi-prong test for preliminary injunction. Petitioners’ claims do not have a likelihood of success on the merits as Petitioners lack standing to challenge procedures for as-yet uncast ballots and their claims that Respondent Philadelphia County Board of Elections (“Philadelphia”)

lacks authority to issue replacement absentee and mail-in ballots are circular and unsupported. Nor can Petitioners show immediate irreparable harm setting them apart from other voters in the state, let alone harm that would justify disenfranchising eligible voters. Petitioners' requested injunction would also alter the status quo by changing current procedure, would enjoin practices far broader than the claimed injuries, and would disrupt a fast-approaching election.

Petitioner's eleventh-hour request to have this Court limit the ability of county boards of elections to ensure that registered voters can fully exercise their franchise is manifestly against the public interest. For all these reasons and as explained more fully in the accompanying memorandum of law, no injunction is warranted.

In opposition to the Application, Philadelphia states the following:

1. The allegations in this Paragraph are conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

2. The allegations in this Paragraph are conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

3. The allegations in this Paragraph are conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

4. The allegations in this Paragraph are conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

5. The allegations in this Paragraph are conclusions of law to which no response is required and refer to written documents which speak for themselves. To the extent a response is required, the characterizations and allegations are denied.

6. The allegations in this Paragraph are conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

7. The allegations in this Paragraph are conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

8. The allegations in this Paragraph are conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

INJUNCTIVE RELIEF

9. Denied except that it is admitted that Petitioners purport to proceed as stated.

10. The allegations in this Paragraph are conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

11. The allegations in this Paragraph are conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

12. The allegations in this Paragraph are conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

13. The allegations in this Paragraph are conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

14. The allegations in this Paragraph are conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

15. The allegations in this Paragraph are conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

16. The allegations in this Paragraph are conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

WHEREFORE, for all of the foregoing reasons and those set forth in the Memorandum of Law in Opposition, Philadelphia has shown cause why this Court should not issue a preliminary injunction and respectfully requests that the Court deny the Application.

Respectfully submitted,

CITY OF PHILADELPHIA LAW
DEPARTMENT
DIANA P. CORTES, CITY SOLICITOR

DATE: September 16, 2022

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No. 447 MD 2022

**RESPONDENT PHILADELPHIA COUNTY BOARD OF ELECTIONS’
MEMORANDUM OF LAW IN OPPOSITION TO PETITIONERS’
APPLICATION FOR A PRELIMINARY INJUNCTION**

Respondent Philadelphia County Board of Elections (“Philadelphia”), by and through their undersigned counsel, file the instant Memorandum of Law in support of their Answer to the Application for a Preliminary Injunction filed by Petitioners.

Because Petitioners' Application is inexcusably late and fails the traditional, multi-prong test for preliminary injunction, the Court should deny the Application. Petitioners' claims do not have a likelihood of success on the merits as Petitioners lack standing to challenge procedures for as-yet uncast ballots and their claims that Philadelphia lacks authority to issue replacement absentee and mail-in ballots are circular and unsupported. Nor can Petitioners show immediate irreparable harm setting them apart from other voters in the state, let alone harm that would justify disenfranchising eligible voters. Petitioners' requested injunction would also alter the status quo by changing current procedure, seeks to enjoin practices far broader than the claimed injuries, and would disrupt a fast approaching election. Petitioner's eleventh-hour request that this Court limit the ability of county boards of elections to ensure that registered voters can fully exercise their franchise is manifestly against the public interest. For all these reasons and as explained more fully below, no injunction is warranted.

I. MATTER BEFORE THE COURT

Philadelphia requests the Court deny Petitioners' Application for a Preliminary Injunction.

II. RESTATEMENT OF QUESTIONS INVOLVED

Question 1: Should this Court deny as barred by laches Petitioners’

Application to enjoin Philadelphia’s provision of replacement ballots to voters whose ballots have technical defects?

Suggested Answer: Yes

Question 2: Should this Court deny Petitioners’ Application because

Petitioners have not, and cannot, satisfy the stringent requirements of the multi-prong test for a preliminary injunction?

Suggested Answer: Yes

III. PROCEDURAL BACKGROUND

Petitioners filed their Petition for Review in this Court on September 1, 2022. On September 7, 2022, Petitioners filed the instant application for a preliminary injunction. On September 9, 2022, this Court set a schedule for briefing and argument.

IV. ARGUMENT

Petitioners’ Application for preliminary injunction seeks the same sweeping relief—the disenfranchisement of voters with minor defects to their otherwise valid ballots—that the federal courts denied other challengers two years ago. This Application, filed on the eve of the 2022 General Election, comes too late and the Court should summarily deny it. Nor can Petitioners satisfy any of the necessary prerequisites for entitlement to a preliminary injunction, let alone all of them. For

those reasons, too, this Court should deny Petitioners' Application for a Preliminary Injunction.

A. As a Threshold Matter, the Court Should Summarily Deny Petitioners' Application Because They Have Inexcusably Delayed Seeking Injunctive Relief.

Courts have denied preliminary injunctions based on laches or similar concepts where a movant's failure to act has prejudiced the targeted party. As long ago as *Becker v. Lebanon & M. Ry. Co.*, 41 A. 612 (Pa. 1898), the Supreme Court approved the application of laches where a plaintiff had promptly brought an action against a railway company to prevent the construction of its railway on a road abutting onto his property, but then made no motion for a preliminary injunction until the road had been built.

In this case, Petitioners have waited nearly two years, until the eve of an election, to challenge publicly announced practices of providing replacement ballots to voters whose ballots have technical defects. Nothing stopped Petitioners from challenging this practice in 2020, in 2021, or even for the 2022 primary earlier this year. They could have sought the instant relief well in advance of this election, when Philadelphia and other counties would have had time to adjust their practices, retrain their staff, and educate voters for future elections based on the court's final ruling. Instead, Petitioners waited until that time had passed, and then sought immediate preliminary relief. This Court should not reward Petitioners'

legal gamesmanship and should instead deny Petitioners' request outright because of the prejudice it would inflict on Philadelphia and its voters this election cycle.

B. Petitioners Cannot Meet the Stringent, Well-Defined Requirements to Obtain a Preliminary Injunction.

To obtain the requested preliminary injunction, Petitioners must establish every one of the following prerequisites:

First, a party seeking a preliminary injunction must show that an injunction is necessary to prevent immediate and irreparable harm that cannot be adequately compensated by damages.

Second, the party must show that greater injury would result from refusing an injunction than from granting it, and, concomitantly, that issuance of an injunction will not substantially harm other interested parties in the proceedings.

Third, the party must show that a preliminary injunction will properly restore the parties to their status as it existed immediately prior to the alleged wrongful conduct.

Fourth, the party seeking an injunction must show that the activity it 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.

Fifth, the party must show that the injunction it seeks is reasonably suited to abate the offending activity.

Sixth and finally, the party seeking an injunction must show that a preliminary injunction will not adversely affect the public interest.

Summit Towne Centre, Inc. v. Shoe Show of Rocky Mount, Inc., 828 A.2d 995, 1001 (Pa. 2003) (citations omitted).

As demonstrated below, Petitioners cannot satisfy any, much less all, of the six necessary factors, and the requested injunction must therefore be denied.

1. Petitioners Cannot Demonstrate a Clear Right to Relief and a Probability of Success on the Merits.

a. Petitioners Have No Standing to Challenge Philadelphia's Practice

Petitioners, party organizations, and individual voters from other counties are unlikely to succeed because they lack standing to challenge Philadelphia's replacement ballot practice.

The core concept of standing is that a person who is not adversely affected in any way by the matter he seeks to challenge is not aggrieved thereby and has no standing to obtain a judicial resolution of his challenge.

An individual can demonstrate that he has been aggrieved if he can establish that he has a substantial, direct and immediate interest in the outcome of the litigation. *A party has a substantial interest in the outcome of litigation if his interest surpasses that of all citizens in procuring obedience to the law.*

Fumo v. City of Philadelphia, 972 A.2d 487, 496 (Pa. 2009) (citations and internal quotation marks omitted) (emphasis added).

Petitioners have failed to show they have any interest surpassing the interest of every other citizen in having ballots counted properly and boards of elections obey the law. Party organizations cannot show any particularized injury given that it is pure speculation at this time what parties' candidates any cured ballots will favor. *Cf. Donald J. Trump for President, Inc. v. Boockvar*, 493 F. Supp. 3d 331,

380 (W.D. Pa. 2020) (“There is nothing in the record to establish that potential voter fraud and dilution will impact Republicans more than Democrats.”). Nor can individuals claim any particularized injury surpassing others when, even if the alleged dilution occurs, it would affect all other voters equally. *Id.* at 390 (emphasis added). Plaintiffs’ claimed vote dilution harm is brought in advance of the election on a theory that there is a potential risk of allegedly improper votes being counted. Just as the District Court found in 2020, this fails to establish concrete injury. *Id.* at 380. Moreover, Petitioners are not Philadelphia voters who will be affected by Philadelphia’s practice.

Because they lack standing to pursue their claims, Petitioners have not shown a probability of success on the merits.

b. *Petitioners Have Not Shown Philadelphia’s Practices Are Clearly Unlawful*

Petitioners’ merits arguments cannot withstand the slightest scrutiny let alone show a clear right to relief. First, they claim that the Supreme Court’s *Pennsylvania Democratic Party v. Boockvar* opinion, in refusing to *require* notice-and-cure, actually prohibits it entirely, and that Respondents are estopped from arguing otherwise. And second, they suggest county boards cannot choose to provide for notice-and-cure under their regulatory authority because it is not explicitly detailed as a power or duty of county boards and may vary in policy or practice between counties. None of these claims have merit.

In *Pennsylvania Democratic Party v. Boockvar*, the Pennsylvania Supreme Court held that the Election Code does not *require* county boards to provide a notice and an opportunity for voters to cure their defective ballots, in part because that policy decision was best suited for the legislature, not the Court. 238 A.3d 345, 374 (Pa. 2020). But Petitioners misconstrue the Pennsylvania Supreme Court’s reasoning as a definitive ruling on whether providing the opportunity to cure—and by extension delegation of such authority to county boards—is *permitted* under the election code. The language in *Pennsylvania Democratic Party* does not support either reading, and Petitioners’ failure to quote any language actually stating their alleged holding proves the point. *See* Pet’rs Br. at 21-22. Further, Petitioners offer no legal basis for the incredible proposition that a decision holding that the Election Code does not affirmatively require a specific procedure means that the Code prohibits such a procedure. And because the decision does not bar boards from voluntarily adopting cure procedures, estoppel does not apply either.

Petitioners’ arguments that the county boards lack authority fare no better. Petitioners acknowledge that the legislature has granted boards powers, including rulemaking authority, but suggest the lack of explicit mention of notice-and-cure forecloses it. Pet’rs Br. at 24 (quoting 25 P.S. § 2642). But Section 2642 is a broad grant of power allowing boards to regulate elections not inconsistent with the

Code; it does not spell out every detail of every action a board may take. If it did, rulemaking authority would be unnecessary. And the very rulemaking section Petitioners cite empowers boards to instruct local election officials and voters. *See id.* at 24-25 (quoting 25 P.S. § 2642(f)). What's more, other Code provisions allow eligible voters to request a ballot and vote by mail. *See generally* 25 P.S. 3146.1 *et seq.* Boards are required to mail absentee and mail-in ballots to qualified electors when they receive acceptable applications. *See* 25 P.S. 3146.5(a)-(b)(1); *id.* § 3150.15. And more recently, the General Assembly has permitted qualified electors to request and receive their absentee or mail-in ballot in person from the county board. *See* 25 P.S. 3146.5(b)(2). "If a voter presents the voter's application within the county board of elections' office in accordance with this section, a county board of elections may not deny the voter's request to have the ballot presented to the voter while the voter is at the office unless there is a bona fide objection to the absentee or mail-in ballot application." *Id.*

Philadelphia's procedures have always been consistent with these dictates, even as alleged by Petitioners. Petitioners allege that Philadelphia permits qualified electors to request replacement absentee and mail-in ballot packages when the Board has not received a valid ballot from that elector. *See* Pet. For Review ¶ 70; *id.* Ex. C. Though Petitioners characterize this as a "cure procedure," their own exhibit shows that this is a misnomer. Among other reasons, replacement ballot

packages may be issued because the original ballot was returned by the postal service as “UNDELIVERABLE.” *Id.* Ex. C. Nor does the Election Code prohibit the issuance of replacement ballot packages where, for instance, all or part of the ballot package is misdelivered and never reaches the voter, or where the voter has made an error in the process of marking their ballot. In those cases, the voter does not “cure” an invalid ballot; instead, they submit a replacement ballot. Petitioners’ argument that Philadelphia practice is (a) “inconsistent with law” because the Election Code allegedly does not authorize it and (b) that it is unauthorized because it is inconsistent with law, is simply circular reasoning that has no grounding in the statutory texts. Indeed, county boards’ rulemaking authority “not inconsistent with law, as they may deem necessary for the guidance of . . . electors” directly contemplates rulemaking where the Election Code does not explicitly provide for a necessary procedure; such delegation would be pointless otherwise. 26 P.S. § 2642(f).

Petitioners’ *expressio unis* and uniformity arguments also collapse when scrutinized. Petitioners claim the Code’s provision allowing voters to corroborate their application with proof of identification after voting forecloses notice-and-cure of ballots themselves, and that the Code’s requirement that elections be “uniformly conducted” bars notice-and-cure procedures merely because the minutiae of the procedures may vary between counties. Petitioners suggest that because the Code

requires county boards to allow voters to cure identification issues, it implicitly *prohibits* curing defective ballots, including Philadelphia's issuance of replacement ballots to voters who return invalid ballots. But Petitioners provide no authority for implying a prohibition on a voluntary practice relating to ballots from the involuntary requirement of a different practice relating to applications. For instance, county boards are required to accept absentee ballots at their main offices, but that requirement does not prohibit them from establishing and accepting such ballots at optional drop boxes. *Pa. Democratic Party*, 238 A.3d at 361. And the Court's recognition of drop boxes also defeats Petitioners' uniformity claim. It is undisputed that counties may, but are not required, to establish drop boxes for voters to return their ballots, without any suggestion that doing so violates the requirement of uniformity in elections. *See id.* So too here, where the laws governing the election are uniform and ballots are measured against the same standard, county variations in how those ballots are lawfully distributed and initially processed do not offend Pennsylvania's voting laws.

Because Philadelphia's issuance of replacement ballots is permitted by the Election Code, and because Petitioners cannot show that the practice is clearly prohibited, they have not shown a clear right to relief necessary for injunctive relief.

c. *Petitioners Have Not Shown a Violation of the Federal Elections Clause*

Petitioners have also failed to show a likelihood of success and clear right to relief on their federal Elections Clause claim. Petitioners’ theory—recently used to challenge interpretations by state courts, *see, e.g., Moore v. Harper*, 142 S. Ct. 2901 (2022)—essentially rehashes their lack-of-authority and uniformity claims, and should be rejected for the same reasons. *See* Pet’rs Br. at 31-32. Because Philadelphia’s practice is authorized—and certainly not prohibited—by the Election Code enacted by the General Assembly, there is no violation of the Elections Clause.

2. *“Notice” and “Cure” of Invalid Ballots by Eligible Voters Is Not An Immediate and Irreparable Harm and An Injunction Would Impose Greater Injury on Disenfranchised Voters than Petitioners*

Two of the most important factors for the Court to consider before granting preliminary injunctive relief are whether the injunction is necessary to prevent “immediate” and “irreparable” harm to the movant, *Summit Town Centre, Inc.*, 828 A.2d at 1001, and whether that harm is greater than the harm the injunction would impose on others and the public, *New Castle Orthopedic Assocs. v. Burns*, 392 A.2d 1383, 1385 (Pa. 1978). But Petitioners have not shown any actual immediate and irreparable harm, and instead rely on a theory of *per se* irreparable harm duplicative of their defective merits arguments; as a result, the harm from granting

an injunction on disenfranchised voters would far outweigh the nominal harm from Petitioners' claimed statutory violation.

Petitioners' base their argument on language suggesting that unlawful action or conduct always constitutes irreparable harm where "a statute proscribes" that activity. Pet'rs Br. at 14 (quoting *Commonwealth v. Coward*, 414 A.2d 91, 98 (Pa. 1980)). But as discussed above, no statute "proscribes" Philadelphia's replacement ballot practice, and for Petitioners' thinly argued statutory allegations to satisfy the irreparable harm prong, at the absolute minimum, they would have to "clearly establish" the violation by showing that there was no dispute as to the underlying facts of who—if anyone—is harmed, when, and how. *Cappiello v. Duca*, 672 A.2d 1373, 1377-78 (Pa. Super. Ct. 1996); cf. *SEIU Healthcare Pa. v. Commonwealth*, 104 A.3d 495, 508-09 (Pa. 2014) ("It is undisputed that the Executive Branch proposes to close more than one-third of the existing sixty Centers and to furlough twenty-six nurse consulting positions. Even absent factual findings by the Commonwealth Court regarding the pros and cons of the Executive Branch's proposal, it is clear that such action will reduce the number of Centers and the level of public health services in direct contravention of the plain language of Section 1403(c)(1)."). Having failed to do so, *see supra* Part IV.B.1.b., Petitioners have failed to show the necessary irreparable harm.

Further, Petitioners' proposed preliminary injunction would inflict far greater harm on voters and the public than Petitioners' claimed injuries. Petitioners seek to stop county boards from allowing voters who are admittedly qualified to cast an absentee or mail-in ballot, and who have timely done so, from having their votes counted because of technical defects detected before the close of polls on Election Day. Put simply, Petitioners seek to disenfranchise qualified voters by invalidating their entire ballots, to avoid allegedly "diluting" Petitioners' ballots. Pet. ¶ 34. Not only that, Petitioners seek to do so now, on a preliminary basis, before this Court has finally determined the merits of the issues. But if Petitioners' injunction is granted now and the Court later comes to a different final conclusion, those voters will still have been disenfranchised because they were deprived of the opportunity to cure their technically deficient ballots. Compared with that truly irreparable harm, Petitioners' bare claim of an implicit statutory violation is far outweighed and no injunction is appropriate.

3. *An Injunction Would Disrupt the Status Quo*

Petitioners also claim that their proposed injunction would not change the status quo, but their recitation of recent elections practices shows just the opposite. As Petitioners acknowledge, county boards have been providing what Petitioners call notice-and-cure for multiple elections dating back to 2020. *See, e.g.*, Pet. ¶¶ 66-70. These Petitioners did not object to those practices then, rendering them the

“last peaceable and lawful uncontested” status. *Hatfield Twp. v. Lexon Ins. Co.*, 15 A.3d 547, 555 (Pa. Commw. 2011). Petitioners seek to change that status quo by prohibiting the continued use of those previously uncontested procedures, which have been publicized to voters and in some cases contractually mandated and submitted to courts. *See, e.g.*, Pet., Exs. C, E, F. To adopt Petitioners’ conception of the status quo by retroactively invalidating heretofore unchallenged practice would effectively eliminate this prong of the test by turning every injunction into a preservation of the “status quo.” As a result, the Court must deny Petitioners’ requested injunction.

4. *Petitioners Requested Injunction Is Not Reasonably Tailored*

While Petitioners’ claimed harm is the violation of law and dilution of votes from the counting of cured ballots, Pet’rs Br. at 17, their proposed injunction is far broader. Petitioners’ requested relief goes far beyond addressing the actual counting of allegedly problematic ballots. Petitioners seek to have this Court enjoin the county boards from providing even notice to voters or developing potential procedures. Yet Petitioners have not alleged how the development of procedures or notice to voters of invalidity will harm Petitioners. Because the requested injunction is not reasonably suited to abate the alleged harm, and because it would impose far greater harm on disenfranchised voters, it should be denied entirely.

5. *A Disruptive, Disenfranchising Injunction Is Against the Public Interest*

The public interest also favors denying Petitioners' request injunction.

Election Day is less than two months away and voters will be receiving mail-in and absentee ballots imminently. Forcing county boards with established procedures to alter those procedures and expend resources educating voters about new, potentially temporary rules will disrupt preparation for the election and cause voter confusion. The public interest in an orderly election favors the denial of late-breaking requests for temporary injunctive relief.

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V. CONCLUSION

Petitioners have failed to timely bring their Application and failed to meet their burden of establishing the requirements for obtaining a preliminary injunction. Accordingly, for all the reasons set forth herein, Petitioners' Application must be denied.

Respectfully submitted,

CITY OF PHILADELPHIA LAW
DEPARTMENT
DIANA P. CORTES, CITY SOLICITOR

DATE: September 16, 2022

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