

HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER
Robert A. Wiygul (I.D. No. 310760)
John B. Hill (I.D. No. 328340)
One Logan Square, 27th Floor
Philadelphia, PA 19103-6933
(215) 568-6200

PENNSYLVANIA DEPARTMENT
OF STATE
Kathleen M. Kotula (I.D. No. 86321)
306 North Office Bldg.
401 North Street
Harrisburg, PA 17120-0500
(717) 783-1657

GOVERNOR'S OFFICE OF
GENERAL COUNSEL
Jacob B. Boyer (I.D. No. 324396)
333 Market Street, 17th Floor
Harrisburg, PA 17101
(717) 460-6786

TUCKER LAW GROUP, LLC
Joe H. Tucker, Jr. (I.D. No. 56617)
Dimitrios Mavroudis (I.D. No. 93773)
1801 Market Street, Suite 2500
Philadelphia, PA 19103
(215) 875-0609

OFFICE OF ATTORNEY
GENERAL
Elizabeth P. Lester-Abdalla
(I.D. No. 327276)
1600 Arch Street, Suite 300
Philadelphia, PA 19103
(215) 970-0993

Counsel for Respondents Al Schmidt and Jessica Mathis

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

REPUBLICAN NATIONAL
COMMITTEE, et al.,
Petitioners,

v.

LEIGH M. CHAPMAN, in her official capacity as
Acting Secretary of the Commonwealth of
Pennsylvania, et al.,
Respondents.

No. 447 MD 2022

**COMMONWEALTH RESPONDENTS' RESPONSE TO
PETITIONERS' APPLICATION FOR LEAVE
TO FILE AMENDED PETITION FOR REVIEW**

Respondents Al Schmidt, in his official capacity as Acting Secretary of the Commonwealth,¹ and Jessica Mathis, in her official capacity as Director of the Pennsylvania Bureau of Elections (collectively, the “Commonwealth Respondents”), submit this response to Petitioners’ Application for Leave to File Amended Petition for Review (the “Application for Leave”).

The Commonwealth Respondents take no position on the Application for Leave.

By way of further response, the Commonwealth Respondents believe that Petitioners’ proposed Amended Petition for Review is, like the currently operative Petition, fatally deficient in multiple respects. Accordingly, if the Court grants the Application for Leave, the Commonwealth Respondents intend to file preliminary objections to Petitioners’ amended pleading.

HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER

Dated: February 13, 2023

By: /s/ Robert A. Wiygul
Robert A. Wiygul (I.D. No. 310760)
John Hill (I.D. No. 328340)
One Logan Square, 27th Floor
Philadelphia, PA 19103
Tel: (215) 568-6200
Fax: (215) 568-0300

- and -

¹ Respondent M. Leigh Chapman resigned the position of Acting Secretary of the Commonwealth on January 17, 2023; Al Schmidt is currently serving as Acting Secretary of the Commonwealth.

GOVERNOR'S OFFICE OF GENERAL
COUNSEL

Jacob B. Boyer (I.D. No. 324396)
333 Market Street, 17th Floor
Harrisburg, PA 17101
(717) 460-6786

OFFICE OF ATTORNEY GENERAL

Elizabeth P. Lester-Abdalla (I.D. No. 327276)
1600 Arch Street, Suite 300
Philadelphia, PA 19103
(215) 970-0993

PENNSYLVANIA DEPARTMENT
OF STATE

Kathleen M. Kotula (I.D. No. 86321)
306 North Office Bldg.
401 North Street
Harrisburg, PA 17120-0500
(717) 783-1657

TUCKER LAW GROUP, LLC

Joe H. Tucker, Jr. (I.D. No. 56617)
Dimitrios Mavroudis (I.D. No. 93773)
1801 Market Street, Suite 2500
Philadelphia, PA 19103
(215) 875-0609

*Counsel for Respondents Al Schmidt and
Jessica Mathis*

CERTIFICATION REGARDING PUBLIC ACCESS POLICY

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

Dated: February 13, 2023

/s/ Robert A. Wiygul
Robert A. Wiygul

RETRIEVED FROM DEMOCRACYDOCKET.COM