

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

CASA,

Plaintiff,

v.

JULIE WHEELER, DOUG HOKE, RON  
SMITH, in their official capacities as the  
York County Board of Elections,

Defendants.

**Civ. Action No. 1:22-cv-01648  
(Hon. Jennifer P. Wilson)**

**JOINT STATUS REPORT**

Plaintiff CASA and Defendants Julie Wheeler, Doug Hoke, and Ron Smith, in their official capacities as the York County Board of Elections, hereby submit this Joint Status Report in this case filed under Section 4(e) of the federal Voting Rights Act, 52 U.S.C. § 10303(e).

Pursuant to the Parties' November 2, 2022 agreement, Plaintiff and Defendants met on December 9, 2022 to discuss settling the instant complaint. On January 9, 2023, Plaintiff presented Defendants with a written settlement proposal. Since then, Plaintiff and Defendants have continued to negotiate the terms and conditions of the settlement agreement.

On February 10, 2023, Plaintiff presented Defendants with a proposed Confidentiality Agreement to protect information exchanged in furtherance of

settlement negotiations. The parties expect this Agreement to facilitate the ongoing settlement negotiations.

Based on the foregoing, the Parties propose to stay proceedings in this case and to file a further Joint Status Report on March 1, 2023, advising the Court of the status of their discussions.

Dated: February 15, 2023

By: /s/David J. Freedman  
David J. Freedman, Esq. (Pa. Bar. No. 207257)  
dfreedman@barley.com  
213 Market Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101  
Tel: (717) 299-5201  
Fax: (717) 291-4660

Michéle Pokrifka, Esq. (Pa. Bar #66654)  
MPokrifka@YorkCountyPA.gov  
Deirdre Sullivan, Esq. (Pa. Bar #84977)  
dsullivan@YorkCountyPA.gov  
Office of the York County Solicitor  
28 East Market Street, 2<sup>nd</sup> Floor  
York, Pennsylvania 17401

*Attorneys for Defendants*

By: /s/ Julia Chapman  
Julia Chapman, Esq.  
Julia.chapman@dechert.com  
Neil Steiner, Esq.  
Neil.steiner@dechert.com  
Dechert LLP  
Cira Center, 2929 Arch Street  
Philadelphia, PA 19104  
Tel: (215) 994-2060  
Fax: (215) 655-2060

Lourdes Rosado, Esq.  
lrosado@latinojustice.org  
Ghita Schwarz, Esq.  
gschwarz@latinojustice.org  
Miranda Galindo, Esq.  
mgalindo@latinojustice.org  
Rayza B. Goldsmith, Esq.  
rgoldsmith@latinojustice.org  
LatinoJustice PRLDEF  
475 Riverside Drive, Suite 1901  
New York, New York 10115  
Tel: (212) 739-7504

*Attorneys for Plaintiff*