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EXHIBIT 1

Motion to Stay

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

BETTE EAKIN, *et al.*,

Plaintiffs

v.

**ADAMS COUNTY BOARD OF
ELECTIONS, *et al.*,**

Defendants

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No. 1:22–CV–340–SPB

**MOTION FOR A STAY PENDING APPEAL BY
INTERVENOR-DEFENDANT THE COMMONWEALTH OF
PENNSYLVANIA**

AND NOW, comes Attorney General David W. Sunday, Jr., by and through counsel and on behalf of the Commonwealth of Pennsylvania, and moves this Honorable Court to stay the effect of its Order dated March 31, 2025, (*see* ECF 439), pending appeal. In support of this motion, undersigned counsel attaches a Proposed Order and Brief in Support of Motion for a Stay Pending Appeal.

WHEREFORE, the Commonwealth respectfully requests that this Honorable Court enter an order staying the effect of its judgment.

Respectfully submitted,

DAVID W. SUNDAY, JR.
Attorney General

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Date: April 16, 2025

By: /s/ Nicole R. DiTomo
NICOLE R. DITOMO
Chief Deputy Attorney General
Attorney ID: 315325

BRETT GRAHAM
Deputy Attorney General
Attorney ID: 330556

Counsel for the Commonwealth

CERTIFICATE OF SERVICE

I, Nicole R. DiTomo, Chief Deputy Attorney General, do hereby certify that on this day, a true and correct copy of the foregoing motion has been filed electronically and is available on the Court's Electronic Case Filing System.

/s/ Nicole R. DiTomo
NICOLE R. DITOMO
Chief Deputy Attorney General

Date: April 16, 2025

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