

HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER
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Counsel for Respondents

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

<p>CAROL ANN CARTER; MONICA PARRILLA; REBECCA POYOUROW; WILLIAM TUNG; ROSEANNE MILAZZO; BURT SIEGEL; SUSAN CASSANELLI; LEE CASSANELLI; LYNN WACHMAN; MICHAEL GUTTMAN; MAYA FONKEU; BRADY HILL; MARY ELLEN BALCHUNIS; TOM DEWALL; STEPHANIE MCNULTY; and JANET TEMIN,</p> <p style="text-align: center;">Petitioners,</p> <p style="text-align: center;">v.</p> <p>VERONICA DEGRAFFENREID, in her official capacity as the Acting Secretary of the Commonwealth of Pennsylvania; JESSICA MATHIS, in her official capacity as Director for the Pennsylvania Bureau of Election Services and Notaries,</p> <p style="text-align: center;">Respondents/Appellants.</p>	<p>No. 464 MD 2021</p>
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No. 464 MD 2021

<p>PHILIP T. GRESSMAN; RON Y. DONAGI; KRISTOPHER R. TAPP; PAMELA GORKIN; DAVID P. MARSH; JAMES L. ROSENBERGER; AMY MYERS; EUGENE BOMAN; GARY GORDON; LIZ MCMAHON; TIMOTHY G. FEEMAN; and GARTH ISAAK,</p> <p style="text-align: center;">Petitioners,</p> <p style="text-align: center;">v.</p>	<p>No. 465 MD 2021</p>
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No. 465 MD 2021

VERONICA DEGRAFFENREID, in her official capacity as the Acting Secretary of the Commonwealth of Pennsylvania; JESSICA MATHIS, in her official capacity as Director for the Pennsylvania Bureau of Election Services and Notaries,

Respondents/Appellants.

RESPONSE TO THE APPLICATION TO INTERVENE OF CITIZEN-VOTER INTERVENORS

Respondents, Secretary of the Commonwealth Veronica Degraffenreid and Director of the Bureau of Election Services and Notaries Jessica Mathis, submit this response to the Application to Intervene filed by proposed “Citizen-Voter Intervenors” Leslie Oshe, Kim Geyer, Michael T. Slupe, Candee Barnes, Thomas Reep, Brandy Reep, Kenneth Lunsford, Tammy Lunsford, James Thompson, Pamela Thompson, Joseph Renwick, Stephanie Renwick, Louis Capozzi, David Ball, Mary E. Owlett, Kristine Eng, Justin Behrens, James P. Foreman, Matthew J. Stuckey, Anthony J. Luther, Linda C. Daniels, Jeffrey Piccola, James Vasilko, Jay Hagerman, and Evan P. Smith (the “Application”).

Respondents take no position on the Application. However, Respondents note their concern that granting leave to intervene as a party to any individual Pennsylvania voter who desires to submit a proposed congressional redistricting map, or otherwise to have input into the congressional redistricting process, has the

potential to unduly burden and delay these proceedings—particularly with respect to the conduct of any hearing.

Respectfully submitted,

Dated: December 31, 2021

HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER

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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: December 31, 2021

/s/ Robert A. Wiygul
Robert A. Wiygul