

3. On August 18, 2022, the Court denied the Caucus's application to intervene but granted the Caucus leave to file a brief as *amicus curiae* on or before August 24, 2022. The prothonotary subsequently returned the Caucus's previously filed answer.

4. Per Pa.R.A.P. 531(b)(1)(iii) and (b)(3), the Caucus's forthcoming *amicus* brief appears to be limited to 7000 words, since that is half the length of a party's principal brief under Pa.R.A.P. 2135(a)(1). See Pa.R.A.P. 531(b)(3) ("An *amicus curiae* brief under subparagraph (b)(1)(iii) is limited to the length specified by the court in approving the motion or, *if no length is specified, to half the length that a party would be permitted under the rules of appellate procedure.*" (emphasis added)).

5. As outlined in the Caucus's application to intervene as well as in its August 17 answer, this matter presents various important questions regarding, among other things, practice and procedure in the Senate.

6. For instance, Petitioners' Application asks the Court to find that Article XI, Section 1 of the Pennsylvania Constitution forbids Senators from considering and approving joint resolutions posing more than one amendment to the Constitution.

7. These and other issues are significant concern to the Caucus and its constituent members—each of whom are Senators with rights to propose and vote on joint resolutions—since it will directly impact their rights as duly elected legislators.

8. Of course, the pending King’s Bench Application also raises issues about important public policy matters, about which the Caucus members are also acutely concerned in their unique capacity as legislators, who have the ability address these matters within the General Assembly.

9. The Caucus believes that it can most fully express its interests and concerns to this Court with the benefit of a longer *amicus* brief than is otherwise permitted by the rules.

10. The proposed 14,000-word brief would be substantially identical to the August 17 answer previously filed by the Caucus.

11. As that answer demonstrates, the Caucus has many perspectives that it respectfully believes the Court should consider as it reviews the important questions posed by the King’s Bench Application.

WHEREFORE, the Caucus requests that the Court grant this application and grant the Caucus leave to file an *amicus* brief not to exceed 14,000 words.

Respectfully submitted,

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