

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

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LARRY KRASNER, IN HIS OFFICIAL :  
CAPACITY AS THE DISTRICT ATTORNEY : No. 563 MD 2022  
OF PHILADELPHIA, :

*Petitioner,* :

v. :

SENATOR KIM WARD, IN HER OFFICIAL :  
CAPACITY AS INTERIM PRESIDENT PRO :  
TEMPORE OF THE SENATE, ET AL., :

*Respondents.* :

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**UNOPPOSED APPLICATION FOR LEAVE TO FILE  
COMBINED, OVER-LENGTH BRIEF**

Respondent Senator Kim Ward respectfully seeks leave to file a combined brief, not to exceed 18,000 words, and in support of this request, states as follows:

1. Per the Court’s Order of December 6, 2022, Respondents are permitted to file a brief in opposition to Petitioner’s application for summary relief by 3 PM on December 16, 2022. The Respondents are further permitted to file a memorandum of law in support of any cross-application for summary relief.

2. Senator Ward intends to cross-move for summary relief by tomorrow’s deadline.

3. But rather than submit a brief in opposition to Petitioner's pending application, and separately submit a memorandum of law in support of the forthcoming application, Senator Ward seeks leave to file a single, combined brief, serving both functions.

4. Senator Ward further seeks leave to file that combined brief with a word count limit not to exceed 18,000 words.

5. Senator Ward respectfully submits a single brief of the above length will create efficiencies for the Court as it reviews these important matters.

6. If the Court grants this request, Senator Ward still intends to meet the 3 PM filing deadline on December 16, 2022.

7. Per Pa.R.A.P. 3707, before filing this application with the Court, via email sent on December 15, 2022, counsel for Senator Ward sought consent from all parties in the relief requested. All parties advised that they consent to the relief requested.

8. Hence, this application is unopposed.

WHEREFORE, Senator Ward respectfully requests that the Court grant this application and permit her to file a combined brief in

opposition to the application for summary relief, and in support of her cross-application for summary relief, not to exceed 18,000 words.

Respectfully submitted,

Dated: December 15, 2022

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*Attorneys for Senator Ward*

**CERTIFICATE OF COMPLIANCE**

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

Dated: December 15, 2022            /s/ Joshua J. Voss