

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

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, :

Petitioners, :

v. :

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, :

v. :

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, :

Petitioners, :

v. :

CASES CONSOLIDATED:

No. 464 M.D. 2021

2022 JAN 12 AM 10:29

RECEIVED
COMMONWEALTH COURT
OF PENNSYLVANIA

Veronica Degraffenreid, in her : No. 465 M.D. 2021
official capacity as the Acting :
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of Pennsylvania; Jessica Mathis, :
in her official capacity as Director :
for the Pennsylvania Bureau of :
Election Services and Notaries, :
Respondents. :

**ANSWER OF PROPOSED INTERVENORS, DRAW THE LINES PA
APPLICANTS,
TO PETITIONERS' APPLICATION FOR EXPEDITED REVIEW**

Pursuant to the order of this Court on January 11, 2022, proposed intervenors Adam Dusen, Sara Stroman, Mike Walsh, Myra Forrest, Athan Biss, Michael Skros, Susan Wood, Jean Handley, Daniel Mallinson, Jesse Stowell, Sandra Strauss, Rick Bryant, Jeffrey Cooper, Kyle Hynes, Priscilla McNulty and Joseph Amodei, each of whom is affiliated in some manner with the Draw The Lines PA project, (the “Draw The Lines PA Applicants”) submit this Answer to the Application for Expedited Review (“Application”) filed by the Gressman Petitioners. The Draw The Lines PA Applicants do not oppose the Application and believe that the deadlines proposed are appropriate. The Draw The Lines PA Applicants are prepared to comply with the proposed deadlines, and to submit their

proposed redistricting plan, the Pennsylvania Citizens' Map, and supporting statement/expert report by the proposed deadlines.¹

Proposed Intervenors, the Draw The Lines PA Applicants, respond to Petitioners' Application as follows:

1. Admitted.

2. Admitted.

3. Admitted.

4. Admitted.

5. Admitted.

6. Admitted. The Draw The Lines PA Applicants agree to follow the proposed schedule. If permitted to participate in these proceedings as intervenors, the Draw The Lines PA Applicants are prepared to submit their redistricting plan and supporting statement/expert report by Friday, January 14, 2022, and to participate in oral argument on Friday, January 21, 2022.

7. The Draw The Lines PA Applicants concur with the position stated in the Application.

¹ Alternatively, should the Court instead adopt the schedule proposed by the Carter petitioners, the Draw The Lines PA Applicants are prepared to comply with the deadlines they propose.

WHEREFORE, for the foregoing reasons, Proposed Intervenors, the Draw The Lines PA Applicants, concur with Petitioners' request that the Court enter the requested accelerated schedule as set forth in Petitioners' proposed order.

Dated: January 12, 2022

Respectfully submitted,

By: /s/ John P. Lavelle, Jr.
John P. Lavelle, Jr. (PA 54279)
Morgan, Lewis, and Bockius LLP
1701 Market St.
Philadelphia, PA 19103
+1.610.331.3910
john.lavelle@morganlewis.com
Counsel for the Draw The Lines PA Applicants

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.

/s/ John P. Lavelle, Jr. (PA 54279)
John P. Lavelle, Jr.

PROOF OF SERVICE

On January 12, 2022, I caused a copy of the foregoing to be served on all counsel of record, pursuant to the Court's instructions, via the email address CommCourtFiling@pacourts.us:

/s/ John P. Lavelle, Jr.
John P. Lavelle, Jr. (PA 54279)
Morgan, Lewis, and Bockius LLP
1701 Market St.
Philadelphia, PA 19103
+1.610.331.3910
john.lavelle@morganlewis.com