



TIMOTHY BONNER, et al.,

Petitioners,

v.

VERONICA DEGRAFFENREID, in her official  
capacity as Acting Secretary of the Commonwealth  
of Pennsylvania, et al.,

Respondents.

No. 293 MD 2021

**RESPONDENTS' APPLICATION FOR SUMMARY RELIEF**  
**REGARDING THE *BONNER* PETITION**

Pursuant to Pa.R.A.P. 1532(b), Respondents, Acting Secretary of the Commonwealth Veronica Degraffenreid and the Department of State of the Commonwealth of Pennsylvania, hereby apply for an order granting summary relief in their favor and against Petitioners with respect to the *Bonner* Petition, on the grounds that: (1) Petitioners lack standing; (2) Petitioners' claims are barred by the doctrine of laches; (3) Petitioners' claims are foreclosed by the statutory time bar set forth in the Act of Oct. 31, 2019, P.L. 552, No. 77, § 13(3); and (4) Petitioners' constitutional arguments are without merit. In support of this application, Respondents rely on their accompanying Memorandum and the Affidavit of Jonathan Marks, which are incorporated by reference herein. A proposed form of order is attached hereto.

WHEREFORE, Respondents respectfully request that the Court grant Respondents' Application for Summary Relief and dismiss the *Bonner* Petition for Review with prejudice.

HANGLEY ARONCHICK SEGAL  
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Dated: September 30, 2021 By: /s/ Michele D. Hangle  
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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

DOUG McLINKO,

Petitioner,

v.

COMMONWEALTH OF PENNSYLVANIA,  
DEPARTMENT OF STATE, et al.,

Respondents.

TIMOTHY BONNER, et al.,

Petitioners,

v.

VERONICA DEGRAFFENREID, in her official  
capacity as Acting Secretary of the Commonwealth  
of Pennsylvania, et al.,

Respondents.

CASES  
CONSOLIDATED

No. 244 MD 2021

No. 293 MD 2021

**[PROPOSED] ORDER GRANTING  
RESPONDENTS' APPLICATION FOR SUMMARY RELIEF  
REGARDING THE *BONNER* PETITION**

NOW, this \_\_\_\_\_ day of \_\_\_\_\_, upon  
consideration of Respondents' Application for Summary Relief Regarding the  
*Bonner* Petition, it is hereby ORDERED that:

1. Respondents' Application for Summary Relief Regarding the *Bonner* Petition is GRANTED; and
2. The Petition for Review filed in case no. 293 MD 2021 is DISMISSED WITH PREJUDICE.

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, J.

**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: September 30, 2021

/s/ Michele D. Hangle  
Michele D. Hangle