

IN THE SUPREME COURT OF PENNSYLVANIA

THE HONORABLE TOM WOLF, GOVERNOR : No. 104 MM 2020
OF THE COMMONWEALTH OF :
PENNSYLVANIA, :

Petitioner, :

v. :

SENATOR JOSEPH B. SCARNATI, III, :
SENATOR JAKE CORMAN, and SENATE :
REPUBLICAN CAUCUS, :

Respondents. :

**COMBINED ANSWER TO PENDING APPLICATIONS FOR
LEAVE TO FILE AMICUS BRIEFS**

In combined answer to the applications for leave to file amicus
briefs by (1) SEIU Healthcare Pennsylvania; (2) Members of the
Democratic Caucuses of the Pennsylvania House of Representatives and
the Senate of Pennsylvania (collectively, “the Members”); (3) CAUSE-
PA, TURN, and Action Alliance (collectively, “CAUSE”); and
(4) The Keystone Research Center and The Pennsylvania Budget and
Policy Center (collectively, “PBPC”), Senator Joseph B. Scarnati, III,
Senator Jake Corman, and the Senate Republican Caucus (collectively,
“the Senators”) aver as follows:

1. Pennsylvania Rule of Appellate Procedure 531(b)(2) provides, in relevant part, as follows: “An amicus curiae brief must contain a statement of the interest of amicus curiae. The statement of interest shall disclose the identity of any person or entity other than the amicus curiae, its members, or counsel who (i) paid in whole or in part for the preparation of the amicus curiae brief or (ii) authored in whole or in part the amicus curiae brief.”

2. The Note to Rule 531 states as follows regarding the above requirement, which was added in 2016: “The 2016 amendment to the rule set forth content and length requirements for amicus curiae briefs. The amendment also established a requirement that all amicus curiae briefs include a statement of interest disclosing whether any party to the appeal has paid in whole or in part for the preparation of the brief.”

3. Against the foregoing, the Senators note that while the proposed amicus briefs from SEIU Healthcare Pennsylvania and PBPC contain the statement required by Rule 531(b)(2), *see* SEIU Br. at 1 n.1; PBPC Br. at 4 n.1, the proposed amicus briefs from the Members and CAUSE contain no such statement.

4. Accordingly, while the Senators have no objection to the Court accepting all four proposed amicus briefs as presently proposed, the Senators respectfully request that the Members and CAUSE be ordered to file an appropriate certification under Rule 531(b)(2).

Respectfully submitted,

Dated: June 19, 2020

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