

IN THE SUPREME COURT OF PENNSYLVANIA

Pennsylvania Democratic Party, et.al.,	:	
Petitioners	:	ELECTION MATTER
	:	
V.	:	NO. 133 MM 2020
	:	
Kathy Boockvar, et.al.	:	
Respondents	:	

**PERRY AND FRANKLIN COUNTIES’ ANSWER TO PETITION FOR
EXTRAORDINARY RELIEF FILED BY RESPONDENT KATHY BOOCKVAR**

Respondents Perry County and Franklin County (hereinafter, “Respondents”) hereby indicate their intent to join the following arguments raised by other parties in this matter in response to the Requests for Declaratory Relief contained in Respondent Kathy Boockvar’s Application for Exercise of this Court’s Extraordinary Jurisdiction:

1. Respondents hereby join the arguments of the Pennsylvania Republican Party with respect to the Secretary’s request to extend the deadline for receipt of mail-in ballots. The deadline should not be extended in any way, as such an extension would be contrary to the plain text of the Election Code.
2. Respondents hereby join the arguments of the Pennsylvania Republican Party and of Respondent Kathy Boockvar with respect to the Pennsylvania Democratic Party’s request for a declaratory judgment that County Boards of Elections must contact voters whose mail-in ballots contain minor errors. This request has no basis in the actual text of the Election Code.
3. Respondents hereby join the arguments of the Pennsylvania Republican Party with respect to the Secretary’s request that so-called “naked ballots” be deemed valid under the Election Code.

4. Respondents hereby join the arguments of Respondent Kathy Boockvar with respect to the constitutionality of the poll watcher residency requirement.

WHEREFORE, this Court should rule according to the arguments referenced above.

Respectfully submitted,

Lavery Law

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DATE: September 8, 2020

CERTIFICATE OF SERVICE

I, Aimee L. Paukovits, an employee with the law firm of Lavery Law, do hereby certify that on this 8th day of September, 2020, I served a true and correct copy of the foregoing Motion via ECF to all counsel of record:

/s/ Aimee Paukovits
Aimee L. Paukovits, Legal Assistant to
Frank J. Lavery, Jr., Esquire, Stephen B. Edwards,
Esquire and Andrew W. Norfleet, Esquire

This document has also been electronically filed and is available for viewing and downloading from the ECF system.