

IN THE SUPREME COURT OF PENNSYLVANIA

IN RE: 2,349 BALLOTS IN THE 2020	:	No. 29 WAP 2020
GENERAL ELECTION	:	
	:	
Petition of: Allegheny County Board of	:	
Elections	:	

EMERGENCY APPLICATION FOR INJUNCTIVE RELIEF

Nicole Zicarelli’s hereby moves this Court for emergency injunctive relief. The above matter before the Court will resolve the fate of some 2,349 ballots cast in the 2020 General Election. However, news reports this morning show that Allegheny County Board of Elections intends to certify its election results today at 10:00 AM despite this Court’s ongoing review.¹ Nicole Zicarelli is likely to succeed on the merits, she will suffer irreparable harm if the results are certified, and the balance of injunctive relief factors favor her as well.

¹ <https://www.spotlightpa.org/news/2020/11/pennsylvania-election-certification-counties-donald-trump-delays/>:
“Despite ongoing litigation regarding a state Senate election, Bethany Hallam, an Allegheny County Board of Elections member, said the board plans to certify results Monday at 10 a.m. Any pending lawsuits don’t affect the county’s requirement to certify results 20 days after the election, she said.”

WHEREFORE, Zicarelli respectfully request that the Court order Allegheny County Board of Elections to STAY certification pending a final order from this Court on the merits.

Respectfully submitted,

Dated: November 23, 2020

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