

IN THE SUPREME COURT OF PENNSYLVANIA

COUNTY OF FULTON, *et al.*,

Petitioners/Appellees,

v.

No.: 3 MAP 2022

SECRETARY OF THE COMMONWEALTH,

Respondent/Appellant.

APPLICATION FOR EXTENSION OF TIME TO ANSWER
APPLICATION FOR CONTEMPT AND SANCTIONS

COMES NOW, THOMAS J. CARROLL, attorney for Appellees in the above-captioned matter, and for his application to extend time to file an answer to Appellant's Application for an Order Holding Appellees in Contempt and for Sanctions, states as follows:

1. On October 18, 2022, at 3:25 p.m., Appellant, Secretary of the Commonwealth, filed an Application for an Order Holding Appellees in Contempt and for Sanctions.
2. The Application and Exhibits total 656 pages.

3. Undersigned counsel was not notified of this filing until yesterday afternoon, and did not receive email notification from the Court's filing system of this filing until 10:41 p.m. on October 19, 2022. While the electronic filing system demonstrates that the application was filed, it did not appear in undersigned's email until last night at 10:41 p.m.

4. The Court issued a letter dated October 18, 2022, in which it is stated that a response to the application is due at 10:00 a.m. today, October 20, 2022.

5. This Court granted an adjournment of oral argument to allow undersigned counsel time to recuperate from a medical emergency and to prepare for oral argument before this Court.

6. Appellant stipulated to that adjournment.

7. The filing which is the subject of this Application requires undersigned counsel to read through and respond to over 600 pages of argument and information by 10:00 a.m. this morning, while in the process of managing his own docket and preparing for said oral argument.

8. Undersigned counsel cannot adequately respond to the Application and Exhibits within that time frame.

9. Given the stealth nature of this filing and its sheer volume and the requirement of a response before oral argument within 6 days, undersigned counsel

requests that this Court grant another adjournment of oral argument and allow two weeks to respond to the Appellant's application.

WHEREFORE, for the reasons stated in this application, undersigned counsel on behalf of Appellees requests the Court to grant an extension of time to respond to Appellant's application and adjourn oral argument so that the Court and the parties can have the benefit of a full substantive response to Appellant's 656-page filing.

Respectfully submitted by:

/s/ Thomas J Carroll

Attorney ID: 53296

Attorney for Petitioners

LAW OFFICE OF THOMAS J CARROLL

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Date: October 20, 2022

VERIFICATION

I, THOMAS J. CARROL, Attorney for Appellees, verify that the facts set forth in the foregoing Appellee's Application are true and correct to the best of my information, knowledge, and belief. I understand that the statements contained herein are subject to the penalties of 18 P.S. § 4904 relating to unsworn falsification to authorities.

Respectfully submitted by:

/s/ Thomas J Carroll

Attorney ID: 53296

Attorney for Petitioners

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Date: October 20, 2022