

**IN THE SUPREME COURT OF PENNSYLVANIA**

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Nos. 76 EM 2024, 77 EM 2024

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BRIAN T. BAXTER and SUSAN T. KINNIRY,  
*Respondents,*

v.

PHILADELPHIA BOARD OF ELECTIONS,  
*Respondent,*

REPUBLICAN NATIONAL COMMITTEE and REPUBLICAN PARTY OF PENNSYLVANIA,  
*Intervenor-Petitioners,*

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**APPLICATION FOR LEAVE TO FILE AMICUS BRIEF ON BEHALF OF  
RESTORING INTEGRITY AND TRUST IN ELECTIONS, INC.**

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Appeal from October 30, 2024 Order of the  
Commonwealth Court of Pennsylvania, No. 1305 C.D. 2024,  
Affirming the September 26, 2024 Order of the  
Court of Common Pleas of Philadelphia County, No. 2024 No. 02481

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Under Pa.R.A.P. 531(b)(1)(iii), applicant, Restoring Integrity and Trust in Elections, Inc., respectfully requests that this Court grant it leave to file an *amicus curiae* brief in support of the Intervenor-Petitioners' emergency application. In support, Amicus avers as follows:

1. Yesterday, the Commonwealth Court of Pennsylvania issued an order in this case holding that Pennsylvania's dating requirement for absentee ballots violates the Free and Equal Elections Clause of the Pennsylvania Constitution.

2. Today, the Republican National Committee and the Republican Party of Pennsylvania filed an emergency application for extraordinary relief from the Commonwealth Court's order, pending a petition for allowance of an appeal.

3. This Court docketed the emergency application at 76 EM 2024 and 77 EM 2024, and ordered responses due by November 1, 2024, at 9:00 AM.

4. Given the emergent nature of this matter, applicant has attached its brief it proposes to file as Exhibit A.

5. Restoring Integrity and Trust in Elections, Inc. is a 501(c)(4) non-profit organization with the mission of protecting the rule of law in the qualifications for, process and administration of, and tabulation of voting throughout the United States.

6. The attached brief complies with this Court's rules and is filed to aid the Court in deciding this emergency application.

Respectfully Submitted,

/s/ Walter S. Zimolong III

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