

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>Joseph Drenth, and the National</b>	:	
<b>Federation of the Blind of</b>	:	
<b>Pennsylvania ,</b>	:	
	<b>Plaintiff</b>	<b>No. 1:20-cv-00829</b>
	:	
<b>v.</b>	:	<b>Judge Wilson</b>
	:	
<b>Kathy Boockvar, Secretary of the</b>	:	<b>Electronically Filed Document</b>
<b>Commonwealth in her official</b>	:	
<b>capacity, and the Department of</b>	:	
<b>State of Pennsylvania,</b>	:	
	<b>Defendants</b>	<i>Complaint Filed May 21, 2020</i>

**MOTION FOR SUMMARY JUDGMENT**

Kathy Boockvar, Secretary of the Commonwealth in her official capacity, and the Department of State of Pennsylvania (“Defendants”) by and through their undersigned counsel, hereby move for summary judgment on both Counts of the Complaint (Doc. 1) pursuant to Federal Rule of Civil Procedure 56 because there is no genuine dispute of material fact, and Defendants are entitled to judgment as a matter of law. Defendants are simultaneously filing their brief in support of this Motion for Summary Judgment.

WHEREFORE Defendants respectfully request that this Honorable Court GRANT their Motion for Summary Judgment, and enter judgment in their favor on all claims.

**Respectfully submitted,**

**JOSH SHAPIRO**  
**Attorney General**

**By:** *s/ Nicole J. Boland*

**NICOLE J. BOLAND**  
**Deputy Attorney General**  
**Attorney ID 314061**

**KAREN M. ROMANO**  
**Chief Deputy Attorney General**  
**Civil Litigation Section**

**Office of Attorney General**  
**15<sup>th</sup> Floor, Strawberry Square**  
**Harrisburg, PA 17120**  
**Phone: (717) 783-3146**

[nboland@attorneygeneral.gov](mailto:nboland@attorneygeneral.gov)

**Date: May 24, 2020**

**Counsel for Defendants**

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<b>Plaintiff</b>	:	<b>No. 1:20-cv-00829</b>
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<b>v.</b>	:	<b>Judge Wilson</b>
	:	
	:	
<b>Kathy Boockvar, Secretary of the</b>	:	<b>Electronically Filed Document</b>
<b>Commonwealth in her official</b>	:	
<b>capacity, and the Department of</b>	:	
<b>State of Pennsylvania,</b>	:	
	:	
<b>Defendants</b>	:	<i>Complaint Filed May 21, 2020</i>

CERTIFICATE OF NON-CONCURRENCE

Plaintiffs' counsel does not concur in this Motion for Summary Judgment.

*s/ Nicole J. Boland*  
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**NICOLE J. BOLAND**

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<b>Plaintiff</b>	:	<b>No. 1:20-cv-00829</b>
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<b>v.</b>	:	<b>Judge Wilson</b>
	:	
<b>Kathy Boockvar, Secretary of the Commonwealth in her official capacity, and the Department of State of Pennsylvania,</b>	:	<b>Electronically Filed Document</b>
	:	
<b>Defendants</b>	:	<i>Complaint Filed May 21, 2020</i>

**CERTIFICATE OF SERVICE**

I, Nicole J. Boland, Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on July 22, 2020, I caused to be served a true and correct copy of the foregoing document to the following:

**VIA ECF**

**Kelly Darr  
Disability Rights  
Pennsylvania  
1800 John F. Kennedy Blvd  
Suite 900  
Philadelphia, PA 19103  
215- 238-8070 ext. 221  
Fax: 215-772-3126  
kdarr@disabilityrightspa.org**

**Kobie A Flowers**  
**Brown Goldstein & Levy,**  
**LLP**  
**120 E Baltimore St**  
**Ste 1700**  
**Baltimore, MD 21202**  
**(410) 962-1030**  
**kflowers@browngold.com**

*s/ Nicole J. Boland*  

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**NICOLE J. BOLAND**  
Deputy Attorney General