

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

JUDICIAL WATCH, INC.,	:	
	:	NO. 1:120-cv-00708
Plaintiff,	:	(Judge Christopher C. Conner)
	:	
v.	:	
	:	
COMMONWEALTH of	:	
PENNSYLVANIA, et al.,	:	
	:	
Defendants.	:	

**MOTION FOR LEAVE TO FILE MEMORANDUM OF LAW OF THE
COUNTY DEFENDANTS IN SUPPORT OF MOTION OF NON-PARTIES
COMMON CAUSE PENNSYLVANIA AND LEAGUE OF WOMEN
VOTERS OF PENNSYLVANIA FOR LEAVE TO INTERVENE**

Defendants Bucks County Commission, Bucks County Board of Elections, Bucks County Registration Commission, Thomas Freitag, in his official capacity as Elections Director for Bucks County, Chester County Commission, Chester County Board of Elections, Chester County Registration Commission, Sandra Burke, in her official capacity as Director of Elections in Chester County, Delaware County Council, Delaware County Board of Elections, Delaware County Registration Commission, and Laureen Hagan, in her official capacity as Chief Clerk, Elections Bureau for Delaware County (the “County Defendants”), hereby move this Court for an order granting them leave to file a memorandum of law in

support of non-parties Common Cause Pennsylvania and League of Women Voters of Pennsylvania's Motion to Intervene beyond the deadline for doing so. The County Defendants' proposed Memorandum of Law in Support of the Motion to Intervene is attached as Exhibit A. The grounds for this Motion are set forth in the accompanying Memorandum of Law, which is incorporated by reference.

WHEREFORE, the County Defendants respectfully request that the Court grant this Motion and direct the Clerk of Court to file on the docket the proposed Memorandum of Law attached as Exhibit A.

Respectfully,

HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER

Date: June 9, 2020

By: /s/ Mark A. Aronchick
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*Special Admission to the Middle
District of Pennsylvania pending.