

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

DONALD J. TRUMP FOR  
PRESIDENT, INC., et al.,

Plaintiffs,

v.

KATHY BOOCKVAR, et al.,

Defendants.

NO. 2:20-cv-00966-NR

**MOTION OF THE BUCKS, CHESTER, MONTGOMERY, AND PHILADELPHIA  
COUNTY BOARDS OF ELECTIONS TO DISMISS THE COMPLAINT  
OR, IN THE ALTERNATIVE, TO ABSTAIN PENDING STATE-COURT RESOLUTION  
OF STATE-LAW QUESTIONS**

Defendants the Board of Elections of Bucks, Chester, Montgomery and Philadelphia Counties hereby move for an Order dismissing all claims in the Complaint with prejudice or, in the alternative, dismissing Counts IV and V of the Complaint with prejudice and staying the claims asserted in Counts I-III and VI-VII pending a final ruling by the Pennsylvania judiciary on the proper construction of the Pennsylvania Election Code provisions at issue. In support of this motion, Movants rely on the accompanying Memorandum of Law. A proposed form of Order is attached hereto.

Dated: July 24, 2020

HANGLEY ARONCHICK SEGAL  
PUDLIN & SCHILLER

By: /s/ Mark A. Aronchick  
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*\* Pro hac vice motion to be filed*

