

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

DONALD J. TRUMP FOR PRESIDENT, INC.; <i>et al.</i> ,)	Civil Action
)	
Plaintiffs,)	
)	No.: 2-20-CV-966
v.)	
)	
KATHY BOOCKVAR; <i>et al.</i> ,)	
)	
Defendants.)	Judge J. Nicholas Ranjan

**DEFENDANT LANCASTER COUNTY BOARD OF ELECTIONS’
ANSWER TO AMENDED COMPLAINT**

Defendant, the Lancaster County Board of Elections, by and through Counsel, hereby answers Plaintiff’s Amended Complaint as follows, denying each and every averment except as expressly admitted below:

I. INTRODUCTION

1. Paragraph 1 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.
2. Denied. Several averments in Paragraph 2 are directed to a party other than Answering Defendant and, accordingly, no response is required. To the extent that a response is required, the remaining averments are denied.
3. Paragraph 3 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.
4. Paragraph 4 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.
5. Admitted in part, denied in part. It is admitted only that Plaintiffs have initiated

suit against the Defendants and seek certain relief. It is denied that Plaintiffs are entitled to the relief sought.

II. JURISDICTION AND VENUE

6. Admitted that jurisdiction properly lies with this Court.

7. Admitted that venue is proper.

III. PARTIES

8-17. Admitted, on information and belief.

IV. FACTUAL ALLEGATIONS

18. Paragraph 18 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

19. Paragraph 19 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

20. Paragraph 20 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

21. Paragraph 21 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

22. Paragraph 22 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

23. Paragraph 23 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

24. Paragraph 24 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

25. Paragraph 25 states a conclusion of law to which no reply is necessary. To the

extent a reply is deemed necessary, the same is denied.

26. Paragraph 26 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

27. Paragraph 27 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

28. Paragraph 28 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

29. Paragraph 29 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

30. Paragraph 30 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

31. Paragraph 31 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

32. Paragraph 32 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

33. Paragraph 33 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

34. Paragraph 34 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

35. Paragraph 35 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

36. Paragraph 36 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

37. Paragraph 37 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

38. Paragraph 38 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

39. Paragraph 39 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

40. Paragraph 40 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

41. Paragraph 41 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

42. Paragraph 42 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

43. Paragraph 43 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

44. Paragraph 44 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

45. Paragraph 45 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

46. Paragraph 46 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

47. Paragraph 47 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

48. Paragraph 48 states a conclusion of law to which no reply is necessary. To the

extent a reply is deemed necessary, the same is denied.

49. Admitted.

50. Paragraph 50 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

51. Paragraph 51 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

52. Paragraph 52 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

53. Paragraph 53 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

54. Paragraph 54 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

55. Paragraph 55 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

56. Paragraph 56 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

57. Paragraph 57 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

58. Paragraph 58 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

59. Paragraph 59 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

60. Paragraph 60 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

61. Paragraph 61 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

62. Paragraph 62 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

63. Paragraph 63 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

64. Paragraph 64 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

65. Paragraph 65 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

66. Paragraph 66 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

67. Paragraph 67 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

68. Paragraph 68 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

69. Defendant is without sufficient information to respond. Accordingly, the same is denied.

70. Defendant is without sufficient information to respond. Accordingly, the same is denied.

71. Defendant is without sufficient information to respond. Accordingly, the same is denied.

72. Defendant is without sufficient information to respond. Accordingly, the same is denied.

73. Defendant is without sufficient information to respond. Accordingly, the same is denied.

74. Defendant is without sufficient information to respond. Accordingly, the same is denied.

75. Defendant is without sufficient information to respond. Accordingly, the same is denied.

76. Defendant is without sufficient information to respond. Accordingly, the same is denied.

77. Defendant is without sufficient information to respond. Accordingly, the same is denied.

78. Paragraph 78 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

79. Paragraph 79 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

80. Paragraph 80 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

81. Paragraph 81 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

82. Paragraph 82 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

83. Paragraph 83 states a conclusion of law to which no reply is necessary. To the

extent a reply is deemed necessary, the same is denied.

84. Paragraph 84 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

85. Paragraph 85 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

86. Paragraph 86 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

87. Paragraph 87 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

88. Paragraph 88 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

89. Paragraph 89 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

90. Admitted.

91. Paragraph 91 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

92. Paragraph 92 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

93. Paragraph 93 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

94. Paragraph 94 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

95. Paragraph 95 states a conclusion of law to which no reply is necessary. To the

extent a reply is deemed necessary, the same is denied.

96. Paragraph 96 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

97. Paragraph 97 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

98. Paragraph 98 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

99. Paragraph 99 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

100. Paragraph 100 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

101. Paragraph 101 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

102. Paragraph 102 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

103. Paragraph 103 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

104. Paragraph 104 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

105. Paragraph 105 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

106. Paragraph 106 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

107. Paragraph 107 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

108. Paragraph 108 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

109. Paragraph 109 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

110. Paragraph 110 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

111. Paragraph 111 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

112. Admitted.

113. Defendant is without sufficient information to respond. Accordingly, the same is denied.

114. Defendant is without sufficient information to respond. Accordingly, the same is denied.

115. Denied. To the extent that the averments in Paragraph 101 are directed to a party other than Answering Defendant, no response is required.

116. Defendant is without sufficient information to respond. Accordingly, the same is denied.

117. Admitted.

118. Admitted.

119. Paragraph 119 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

120. Paragraph 120 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

121. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 121 are directed to a party other than Answering Defendant, no response is required.

122. Admitted.

123. Paragraph 123 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

124. Paragraph 124 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

125. Defendant is without sufficient information to respond. Accordingly, the same is denied.

126. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 126 are directed to a party other than Answering Defendant, no response is required.

127. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 127 are directed to a party other than Answering Defendant, no response is required.

128. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 128 are directed to a party other than Answering Defendant, no response is required.

129. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 129 are directed to a party other than

Answering Defendant, no response is required.

130. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 130 are directed to a party other than Answering Defendant, no response is required.

131. Paragraph 131 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

132. Paragraph 132 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

133. Paragraph 133 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

134. Paragraph 134 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

135. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 135 are directed to a party other than Answering Defendant, no response is required.

136. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 136 are directed to a party other than Answering Defendant, no response is required.

137. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 137 are directed to a party other than Answering Defendant, no response is required.

138. Defendant is without sufficient information to respond. Accordingly, the same is denied.

139. Admitted.

140. Admitted.

141. Paragraph 141 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

142. Paragraph 142 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

143. Defendant is without sufficient information to respond. Accordingly, the same is denied.

144. Admitted.

145. Admitted.

146. Paragraph 146 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

147. Paragraph 147 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

148. Paragraph 148 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

149. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 149 are directed to a party other than Answering Defendant, no response is required.

150. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 150 are directed to a party other than Answering Defendant, no response is required.

151. Paragraph 151 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

152. Paragraph 152 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

153. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 153 are directed to a party other than Answering Defendant, no response is required.

154. Paragraph 154 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

155. Admitted.

156. Paragraph 156 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

157. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 157 are directed to a party other than Answering Defendant, no response is required.

158. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 158 are directed to a party other than Answering Defendant, no response is required.

159. Paragraph 159 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

160. Paragraph 160 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

161. Paragraph 161 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

162. Paragraph 162 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

163. Paragraph 163 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

164. Paragraph 164 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

165. Paragraph 165 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

166. Paragraph 166 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

167. Paragraph 167 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

168. Paragraph 168 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

169. Defendant is without sufficient information to respond. Accordingly, the same is denied.

170. Paragraph 170 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

171. Paragraph 171 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

172. Paragraph 172 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

173. Defendant is without sufficient information to respond. Accordingly, the same is

denied.

174. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 174 are directed to a party other than Answering Defendant, no response is required.

175. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 175 are directed to a party other than Answering Defendant, no response is required.

176. Paragraph 176 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

177. Defendant is without sufficient information to respond. Accordingly, the same is denied.

178. Defendant is without sufficient information to respond. Accordingly, the same is denied.

179. Defendant is without sufficient information to respond. Accordingly, the same is denied.

180. Paragraph 180 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

181. Paragraph 181 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

182. Paragraph 182 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

183. Defendant is without sufficient information to respond. Accordingly, the same is denied.

184. Defendant is without sufficient information to respond. Accordingly, the same is denied.

185. Paragraph 137 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

186. Paragraph 186 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

187. Paragraph 187 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

188. Paragraph 188 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

189. Paragraph 189 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

190. Paragraph 191 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

191. Paragraph 191 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

192. Admitted in part, denied in part. It is admitted only that Plaintiffs have initiated suit against the Defendants and seek certain relief. It is denied that Plaintiffs are entitled to the relief sought.

COUNT I

193. Answering Defendant hereby incorporates by reference its answers to Paragraphs 1-192, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

194. Paragraph 194 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

195. Paragraph 195 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

196. Paragraph 196 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

197. Paragraph 197 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

198. Paragraph 198 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

199. Paragraph 199 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

200. Paragraph 200 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

201. Denied. To the extent that the averments in Paragraph 153 are directed to a party other than Answering Defendant, no response is required.

202. Paragraph 202 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

203. Paragraph 203 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

204. Paragraph 204 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

205. Defendant is without sufficient information to respond. Accordingly, the same is denied.

COUNT II

206. Answering Defendant hereby incorporates by reference its answers to Paragraphs 1-205, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

207. Paragraph 207 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

208. Paragraph 208 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

209. Paragraph 209 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

210. Paragraph 210 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

211. Denied. To the extent that the averments in Paragraph 163 are directed to a party other than Answering Defendant, no response is required.

212. Paragraph 164 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

213. Denied. To the extent that the averments in Paragraph 213 are directed to a party other than Answering Defendant, no response is required.

214. Denied. To the extent that the averments in Paragraph 214 are directed to a party other than Answering Defendant, no response is required.

215. Defendant is without sufficient information to respond. Accordingly, the same is denied.

COUNT III

216. Answering Defendant hereby incorporates by reference its answers to Paragraphs

1-216, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

217. Paragraph 217 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

218. Paragraph 218 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

219. Paragraph 219 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

220. Denied. To the extent that the averments in Paragraph 220 are directed to a party other than Answering Defendant, no response is required.

221. Denied. To the extent that the averments in Paragraph 221 are directed to a party other than Answering Defendant, no response is required.

222. Defendant is without sufficient information to respond. Accordingly, the same is denied.

COUNT IV

223. Answering Defendant hereby incorporates by reference its answers to Paragraphs 1-221, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

224. Paragraph 224 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

225. Paragraph 225 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

226. Paragraph 226 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

227. Defendant is without sufficient information to respond. Accordingly, the same is

denied.

228. Defendant is without sufficient information to respond. Accordingly, the same is denied.

229. Denied. To the extent that the averments in Paragraph 229 are directed to a party other than Answering Defendant, no response is required.

230. Paragraph 230 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

231. Denied. To the extent that the averments in Paragraph 231 are directed to a party other than Answering Defendant, no response is required.

232. Defendant is without sufficient information to respond. Accordingly, the same is denied.

COUNT V

233. Answering Defendant hereby incorporates by reference their answers to Paragraphs 1-232, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

234. Paragraph 234 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

235. Denied. To the extent that the averments in Paragraph 235 are directed to a party other than Answering Defendant, no response is required.

236. Defendant is without sufficient information to respond. Accordingly, the same is denied.

COUNT VI

237. Answering Defendant hereby incorporates by reference its answers to Paragraphs 1-236, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

238. Defendant is without sufficient information to respond. Accordingly, the same is denied.

239. Denied. To the extent that the averments in Paragraph 239 are directed to a party other than Answering Defendant, no response is required.

240. Paragraph 240 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

241. Paragraph 241 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

242. Denied. To the extent that the averments in Paragraph 242 are directed to a party other than Answering Defendant, no response is required.

243. Denied. To the extent that the averments in Paragraph 243 are directed to a party other than Answering Defendant, no response is required.

244. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 244 are directed to a party other than Answering Defendant, no response is required.

245. Paragraph 245 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

246. Denied. To the extent that the averments in Paragraph 246 are directed to a party other than Answering Defendant, no response is required.

247. Denied. To the extent that the averments in Paragraph 247 are directed to a party other than Answering Defendant, no response is required.

248. Defendant is without sufficient information to respond. Accordingly, the same is denied.

COUNT VII

249. Answering Defendant hereby incorporates by reference their answers to Paragraphs 1-248, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

250. Denied. To the extent that the averments in Paragraph 250 are directed to a party other than Answering Defendant, no response is required.

251. Denied. To the extent that the averments in Paragraph 251 are directed to a party other than Answering Defendant, no response is required.

252. Defendant is without sufficient information to respond. Accordingly, the same is denied.

COUNT VIII

253. Answering Defendant hereby incorporates by reference their answers to Paragraphs 1-252, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

254. Paragraph 254 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

255. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 255 are directed to a party other than Answering Defendant, no response is required.

256. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 256 are directed to a party other than Answering Defendant, no response is required.

257. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 257 are directed to a party other than Answering Defendant, no response is required.

258. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 258 are directed to a party other than Answering Defendant, no response is required.

259. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 259 are directed to a party other than Answering Defendant, no response is required.

260. Paragraph 260 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

261. Denied. To the extent that the averments in Paragraph 261 are directed to a party other than Answering Defendant, no response is required.

262. Denied. To the extent that the averments in Paragraph 262 are directed to a party other than Answering Defendant, no response is required.

263. Defendant is without sufficient information to respond. Accordingly, the same is denied.

COUNT IX

264. Answering Defendant hereby incorporates by reference their answers to Paragraphs 1-264, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

265. Paragraph 265 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

266. Denied. To the extent that the averments in Paragraph 266 are directed to a party other than Answering Defendant, no response is required.

267. Defendant is without sufficient information to respond. Accordingly, the same is denied.

WHEREFORE, for all of the reasons set forth herein, the Defendant, Lancaster County Board of Elections, requests this Honorable Court to dismiss Plaintiff's Complaint, including denying Plaintiffs' demand for an award of costs, expenses, and attorneys' fees.

Respectfully submitted,

By /s/ Christina L. Hausner

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*Attorney for Lancaster County Board of
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CERTIFICATE OF SERVICE

I hereby certify that on this day, a true and correct copy of the foregoing document was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system.

Respectfully submitted,

By /s/ Christina L. Hausner

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Date: August 10, 2020

*Attorney for Lancaster County Board of
Elections*