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

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DONALD J. TRUMP FOR PRESIDENT, INC., <i>et al.</i> ,	
Plaintiffs,	
V.	
KATHY BOOCKVAR, in her capacity as Secretary of the Commonwealth of Pennsylvania, <i>et al.</i> ,	
Defendants.	

Civil Action No. 2:20-cv-00966-NR

Judge J. Nicholas Ranjan

#### DEFENDANT-INTERVENORS CITIZENS FOR PENNSYLVANIA'S FUTURE AND SIERRA CLUB'S MOTION TO COMPEL DISCOVERY FROM PLAINTIFFS

Proposed Defendant-Intervenors Citizens for Pennsylvania's Future and Sierra Club, by and through their undersigned counsel, hereby move this Court for an order compelling discovery from Plaintiffs. *See* Proposed Order. In support of this motion, Defendant-Intervenors Citizens for Pennsylvania's Future and Sierra Club incorporate the accompanying Memorandum of Law.

Dated: August 12, 2020

Respectfully submitted,

## /s/ Eliza Sweren-Becker

Myrna Pérez Eliza Sweren-Becker BRENNAN CENTER FOR JUSTICE AT NYU SCHOOL OF LAW 120 Broadway, Suite 1750 New York, NY 10271 Telephone: 646.292.8310 myrna.perez@nyu.edu eliza.sweren-becker@nyu.edu

Sascha N. Rand (pro hac vice forthcoming)

David Cooper (*pro hac vice* forthcoming) Ellyde R. Thompson (*pro hac vice* forthcoming) Ellison Merkel (*pro hac vice* forthcoming) Owen Roberts (*pro hac vice* forthcoming) QUINN EMANUEL URQUHART & SULLIVAN LLP 51 Madison Avenue, 22nd Floor New York, NY 10010 Telephone: 212.849.7175 sascharand@quinnemanuel.com davidcooper@quinnemanuel.com ellydethompson@quinnemanuel.com owenroberts@quinnemanuel.com

Counsel for Proposed Defendant-Intervenors Citizens for Pennsylvania's Future and Sierra Club

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

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DONALD J. TRUMP FOR PRESIDENT, INC., *et al.*, Plaintiffs, v. KATHY BOOCKVAR, in her capacity as Secretary of the Commonwealth of Pennsylvania, *et al.*, Defendants.

Civil Action No. 2:20-cv-00966-NR

Judge J. Nicholas Ranjan

#### **CERTIFICATE OF COUNSEL**

In accordance with § II(e) of this Court's Practices and Procedures, I certify that, on August 10, 2020, counsel for Proposed Defendant-Intervenors Citizens for Pennsylvania's Future and Sierra Club (Myrna Perez) met and conferred with counsel for Plaintiffs (Ronald L. Hicks, Jr., Russell D. Giancola, Jeremy A. Mercer, Matthew E. Morgan, and Justin Clark) on Plaintiffs' objections to Defendant-Intervenors' discovery requests. Counsel for Proposed Defendant-Intervenors Citizens for Pennsylvania's Future and Sierra Club and Plaintiffs were unable to resolve Plaintiffs' objections to Defendant-Intervenors' discovery requests, thus necessitating a Motion to Compel.

[Signature on Next Page]

Dated: August 12, 2020

Respectfully submitted, /<u>s/ Eliza Sweren-Becker</u> Myrna Perez Brennan Center for Justice *Counsel for Proposed Defendant-Intervenors Citizens for Pennsylvania's Future and Sierra Club* 

### **CERTIFICATE OF SERVICE**

I, Eliza Sweren-Becker, certify that I served the foregoing Defendant-Intervenors Citizens for Pennsylvania's Future and Sierra Club's Motion to Compel Discovery from Plaintiffs on the following counsel who are registered as CM/ECF filing users who have consented to accepting electronic service through CM/ECF:

# All Counsel of Record

Dated: August 12, 2020

Respectfully submitted, <u>/s/ Eliza Sweren-Becker</u> Counsel for Proposed Defendant-Intervenors Citizens for Pennsylvania's Future and Sierra Club