

**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

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No. 2:20-cv-00966-NR

**ANSWER TO AMENDED COMPLAINT FOR DECLARATORY JUDGMENT BY
DEFENDANT, CUMBERLAND COUNTY BOARD OF ELECTIONS**

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

INTRODUCTION

1. Paragraph 1 states opinions and conclusions of law to which no response is necessary. To the extent a reply is deemed necessary, the same is denied.
2. Denied. Certain allegations in Paragraph 2 are directed to parties other than Answering Defendant, and, accordingly, no response is required. To the extent a response is required, the allegations are denied.
3. Paragraph 3 states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.
4. Paragraph 4 states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

5. Paragraph 5 is admitted in part and denied in part. It is admitted that Plaintiffs filed the present action and seek the relief stated. Certain portions of Paragraph 5 state opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

JURISDICTION AND VENUE

6. Paragraph 6 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

7. Paragraph 7 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

PARTIES

8. – 17. Admitted, based on information and belief.

FACTUAL ALLEGATIONS

18. Paragraph 18 states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

19. Paragraph 19 states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

20. Paragraph 20 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

21. Paragraph 21 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

22. Paragraph 22 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

23. Paragraph 23 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.
24. Paragraph 24 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.
25. Paragraph 25 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.
26. Paragraph 26 states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.
27. Paragraph 27 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.
28. Paragraph 28 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.
29. Paragraph 29 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.
30. Paragraph 30 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.
31. Paragraph 31 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.
32. Paragraph 32 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.
33. Paragraph 33 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

34. Paragraph 34 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

35. Paragraph 35 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

36. Paragraph 36 states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

37. Paragraph 37 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

38. Paragraph 38 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

39. Paragraph 39 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

40. Paragraph 40 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

41. Paragraph 41 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

42. Paragraph 42 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

43. Paragraph 43 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

44. Paragraph 44 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

45. Paragraph 45 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

46. Paragraph 46 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

47. Paragraph 47 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

48. Paragraph 48 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

49. Paragraph 49 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

50. Paragraph 50 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

51. Paragraph 51 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

52. Paragraph 52 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

53. Paragraph 53 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

54. Paragraph 54 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

55. Paragraph 55 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

56. Paragraph 56 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

57. Paragraph 57 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

58. Paragraph 58 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

59. Paragraph 59 states an opinion and conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

60. Paragraph 60 states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

61. Paragraph 61 states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

62. Paragraph 62 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

63. Paragraph 63 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

64. Paragraph 64 states an opinion and conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

65. Paragraph 65 states conclusions of law to which no response is necessary and references a report about which Defendant has insufficient information to respond. To the extent a response is required, the allegations are denied.

66. Paragraph 66 references a report about which Defendant has insufficient information to respond and, further, states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

67. Paragraph 67 states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

68. Paragraph 68 references articles about which Defendant has insufficient information to respond and states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

69. Paragraph 69 references a report about which Defendant has insufficient information to respond and states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

70. Paragraph 70 references a report and studies about which Defendant has insufficient information to respond and, further, states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

71. Paragraph 71 references studies about which Defendant has insufficient information to respond. To the extent a response is required, the allegations are denied.

72. Paragraph 72 states an opinion and conclusion to which no response is necessary. To the extent a response is required, the allegations are denied.

73. Paragraph 73 references articles to which Defendant has insufficient information to respond. To the extent a response is required, the allegations are denied.

74. Paragraph 74 references an article about which Defendant has insufficient information to respond. To the extent a response is required, the allegations are denied.

75. Paragraph 75 references a study and states opinions and conclusions to which no response is necessary. To the extent a response is required, the allegations are denied.

76. Paragraph 76 states an opinion and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

77. Paragraph 77 states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

78. Paragraph 78 states an opinion and conclusions of law to which no response is necessary and references a report about which Defendant has insufficient information to respond. To the extent a response is required, the allegations are denied.

79. Paragraph 79 states an opinion and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

80. Paragraph 80 states an opinion and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

81. Paragraph 81 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

82. Paragraph 82 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

83. Paragraph 83 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

84. Paragraph 84 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

85. Paragraph 85 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

86. Paragraph 86 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

87. Paragraph 87 states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

88. Paragraph 88 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

89. Paragraph 89 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

90. Paragraph 90 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

91. Paragraph 91 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

92. Paragraph 92 states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

93. Paragraph 93 states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

94. Paragraph 94 states opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

95. Paragraph 95 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

96. Paragraph 96 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

97. Denied in part. It is denied that Act 77 “requires” the County Election Boards to conduct a pre-canvass of all absentee and mail-in ballots received before 7:00 a.m. on Election Day. By way of further answer, Paragraph 97 states conclusions of law to which no response is necessary.

98. Paragraph 98 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

99. Paragraph 99 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

100. Paragraph 100 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

101. Paragraph 101 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

102. Paragraph 102 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

103. Paragraph 103 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

104. Paragraph 104 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

105. Paragraph 105 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

106. Paragraph 106 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

107. Paragraph 107 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

108. Paragraph 108 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

109. Paragraph 109 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

110. Paragraph 110 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

111. Paragraph 111 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

112. Admitted in part, denied in part. It is admitted that Pennsylvania's Primary Election was held on June 2, 2020 and was the first Primary Election held after the enactment of Act 77. It is denied that Defendant Cumberland County Board of Election participated in an "unmonitored all voter mail-in voting alternative."

113. Denied. Defendant is without sufficient information to affirm or deny the allegations set forth in Plaintiffs' Paragraph No. 113.

114. Denied. Defendant is without sufficient information to affirm or deny the allegations set forth in Plaintiffs' Paragraph No. 114.

115. Denied.

116. Denied in part, admitted in part. Defendant is without sufficient information to affirm or deny the allegations set forth in Plaintiffs' Paragraph No. 116. It is admitted that the Department of State issued the January 10, 2020 Guidelines.

117. Paragraph 117 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

118. Paragraph 118 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

119. Paragraph 119 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

120. Paragraph 120 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

121. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 121. To the extent that a response is required, the allegations are denied.

122. Paragraph 122 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

123. Paragraph 123 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

124. Paragraph 124 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

125. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 125. To the extent that a response is required, the allegations are denied.

126. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 126. To the extent that a response is required, the allegations are denied.

127. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 127. To the extent that a response is required, the allegations are denied.

128. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 128. To the extent that a response is required, the allegations are denied.

129. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 129. To the extent that a response is required, the allegations are denied.

130. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 130. To the extent that a response is required, the allegations are denied.

131. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 131. In addition, Paragraph 131 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

132. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 132. In addition, Paragraph 132 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

133. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 133. In addition, Paragraph 133 states

conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

134. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 134. In addition, Paragraph 134 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

135. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 135. To the extent that a response is required, the allegations are denied.

136. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 136. To the extent that a response is required, the allegations are denied.

137. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 137. To the extent that a response is required, the allegations are denied.

138. Denied in part, admitted in part. Defendant is without sufficient information to affirm or deny the allegations set forth in Plaintiffs' Paragraph No. 138. It is admitted that the Department of State issued the January 30, 2020 Guidelines.

139. Paragraph 139 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

140. Paragraph 140 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

141. Paragraph 141 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

142. Paragraph 142 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

143. Denied in part, admitted in part. Defendant is without sufficient information to affirm or deny the allegations set forth in Plaintiffs' Paragraph No. 143. It is admitted that the Department of State issued the March 5, 2020 Guidelines.

144. Paragraph 144 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

145. Paragraph 145 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

146. Paragraph 146 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

147. Paragraph 147 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

148. Paragraph 148 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

149. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 149. To the extent that a response is required, the allegations are denied.

150. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 150. To the extent that a response is required, the allegations are denied.

151. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 151. To the extent that a response is required, the allegations are denied.

152. Paragraph 152 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

153. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 153. Further, Paragraph 153 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

154. Admitted in part, denied in part. It is admitted that Plaintiffs attached Exhibit 1. Defendant is without sufficient information to affirm or deny the allegations concerning Secretary Boockvar in Paragraph 154. To the extent that a response is required, the allegations are denied.

155. Paragraph 155 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

156. Paragraph 156 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

157. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 157. Further, Paragraph 157 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

158. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 158. Further, Paragraph 158 states

conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

159. Paragraph 159 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

160. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 160. Further, Paragraph 160 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

161. Paragraph 161 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

162. Paragraph 162 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

163. Paragraph 163 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

164. Paragraph 164 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

165. Paragraph 165 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

166. Paragraph 166 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

167. Paragraph 167 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

168. Paragraph 168 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

169. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 169. Further, Paragraph 169 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

170. Paragraph 170 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

171. Paragraph 171 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

172. Paragraph 172 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

173. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 173. Further, Paragraph 173 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

174. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 174. Further, Paragraph 174 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

175. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 175. Further, Paragraph 175 states

conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

176. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 176. Further, Paragraph 176 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

177. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 177. Further, Paragraph 177 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

178. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 178. Further, Paragraph 178 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

179. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 179. Further, Paragraph 179 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

180. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 180. Further, Paragraph 180 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

181. Paragraph 181 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

182. Paragraph 182 states a conclusion of law to which no response is necessary. To the extent a response is required, the allegations are denied.

183. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 183. Further, Paragraph 183 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

184. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 184. Further, Paragraph 184 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

185. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 185. Further, Paragraph 185 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

186. Paragraph 186 states Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

187. Paragraph 187 states Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

188. Paragraph 188 states Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

189. Paragraph 189 states Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

190. Paragraph 190 states Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

191. Paragraph 191 states Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

192. Paragraph 192 states Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

193. No response is required to Plaintiffs' Paragraph 193.

194. Paragraph 194 states Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

195. Paragraph 195 states Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

196. Paragraph 196 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

197. Paragraph 197 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

198. Paragraph 198 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

199. Paragraph 199 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

200. Paragraph 200 states conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

201. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 201. Further, Paragraph 201 states conclusions of law to which no response is necessary. To the extent that a response is required, the allegations are denied.

202. Paragraph 202 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

203. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 203 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 203 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

204. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 204 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 204 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

205. Paragraph 205 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

206. No response is required to Plaintiffs' Paragraph 206.

207. Paragraph 207 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

208. Paragraph 208 sets forth conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

209. Paragraph 209 sets forth conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

210. Paragraph 210 sets forth conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

211. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 211. To the extent that a response is required, the allegations are denied.

212. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 212. Further, Paragraph 212 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

213. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 213. Further, Paragraph 213 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

214. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 214 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 214 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

215. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph No. 215. Further, Paragraph 215 sets forth

Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

216. No response is required to Plaintiffs' Paragraph 206.

217. Paragraph 217 sets forth conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

218. Paragraph 218 sets forth conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

219. Paragraph 219 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

220. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 220 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 220 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

221. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 221 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 221 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

222. Paragraph 222 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

223. No response is required to Plaintiffs' Paragraph 223.

224. Paragraph 224 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

225. Paragraph 225 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

226. Paragraph 226 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

227. Paragraph 227 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

228. Paragraph 228 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

229. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 229 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 229 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

230. Paragraph 230 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

231. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 231 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 231 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

232. Paragraph 232 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

233. No response is required to Plaintiffs' Paragraph 233.

234. Paragraph 234 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

235. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 235 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 235 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

236. Paragraph 236 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

237. No response is required to Plaintiffs' Paragraph 237.

238. Paragraph 238 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

239. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 239 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 239 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

240. Paragraph 240 sets forth conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

241. Paragraph 241 sets forth conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

242. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 242 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 242 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

243. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 243 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 243 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

244. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 244 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 244 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

245. Paragraph 245 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

246. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 246 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient

information to affirm or deny the allegations set forth in Paragraph 246 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

247. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 247 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 247 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

248. Paragraph 248 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

249. No response is required to Plaintiffs' Paragraph 249.

250. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 250 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 250 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

251. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 251 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 251 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

252. Paragraph 252 sets forth Plaintiffs' opinions and conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

253. No response is required to Plaintiffs' Paragraph 253.

254. Paragraph 252 sets forth conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

255. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 255 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 255 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

256. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 256 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 256 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

257. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 257 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 257 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

258. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 258 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 258 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

259. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 259 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 259 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

260. Paragraph 260 sets forth conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

261. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 261 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 261 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

262. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 262 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 262 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

263. Paragraph 263 sets forth conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

264. No response is required to Plaintiffs' Paragraph 264.

265. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 265 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient


information to affirm or deny the allegations set forth in Paragraph 265 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

266. Denied. Defendant Cumberland County Board of Elections specifically denies the allegations of Paragraph 266 as those allegations are leveled against the Cumberland County Board of Elections. Defendant Cumberland County Board of Elections is without sufficient information to affirm or deny the allegations set forth in Paragraph 266 as pertaining to the other named defendants. To the extent that a response is required, the allegations are denied.

267. Paragraph 267 sets forth conclusions of law to which no response is necessary. To the extent a response is required, the allegations are denied.

WHEREFORE, Defendant Cumberland County Board of Elections respectfully requests that this Honorable Court enter a judgment in its favor dismissing all claims against the Cumberland County Board of Elections, with prejudice; and, further, award the Cumberland County Board of Elections reasonable costs and expenses, including attorneys' fees associated with defending against this unwarranted litigation, along with any other relief to which the Cumberland County Board of Elections is entitled and that this Honorable Court deems just and proper.

Dated: August 19, 2020

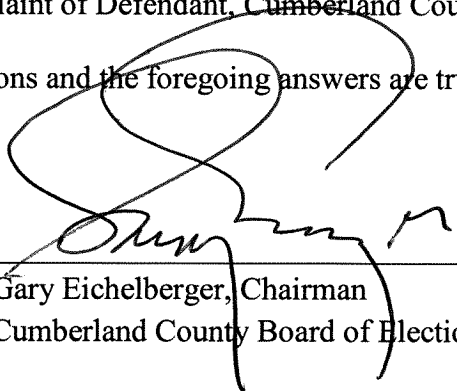


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Cumberland County Solicitor
For the Cumberland County
Board of Elections

VERIFICATION

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that I have reviewed the foregoing Answer to Amended Complaint of Defendant, Cumberland County Board of Elections, and that the factual allegations and the foregoing answers are true and correct.

Date: August 17, 2020



Gary Eichelberger, Chairman
Cumberland County Board of Elections

CERTIFICATE OF SERVICE

I, Keith O. Brenneman, certify that on the 19 day of August, 2020, a copy of the foregoing Answer to Amended Complaint for Declaratory Judgment by Defendant Cumberland County Board of Elections was served by ECF filing on all counsel.



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