In the United States District Court For the Middle District of Pennsylvania Williamsport Division

LAMARR PIRKLE, THEODORE	
DANNERTH, LAUREN DANKS,	Case No.: 4:20-cv-02088-MWB
and CASEY FLYNN,	
Plaintiffs,	
v.	
GOVERNOR THOMAS W.	
WOLF, in his official capacity,	
KATHRYN BOOCKVAR,	
Secretary of the	
Commonwealth of	
Pennsylvania, in her official	
capacity,	
Defendants	

AMENDED MOTION TO CONSOLIDATE AND TO EXPEDITE DISCOVERY

In light of the passage of time and expiration of deadlines proposed in their original motion, Plaintiffs, Lamarr Pirkle, Thoedore Dannerth, Lauren Danks, and Casey Flynn (collectively "Voters") file this amended motion to withdraw their request to consolidate this matter under Fed.R.Civ.P 42(a) with the companion matter Donald J. Trump for President, Inc., et. al. v. Boockvar, et. al., No. 4:20-cv-02078-MWB and to amend their proposed case management schedule to the Court as follows: • A prompt scheduling conference to establish an expedited schedule for resolution of this case;

• Entry of the following expedited schedule:

(1) All discovery requests and responses thereto, and all thirdparty subpoenas and responses thereto, shall be expedited and completed no later than November 18, 2020;

(2) A trial brief will be filed with the Court by all parties no later than one business day prior to the scheduled trial on the merits;

(4) An evidentiary hearing will be held the week of November 23, 2020,

(5) This Court will rule promptly on the matter after the trial on the matter.

Date: November 13, 2020

Respectfully Submitted,

<u>/s/ Anita Y. Milanovich</u> Anita Y. Milanovich (MT #12176)* Of Counsel aymilanovich@milanovichlaw.com MILANOVICH LAW, PLLC 100 E. Broadway Street The Berkeley Room Butte, MT 59701 Telephone: 406/589-6856

James Bopp, Jr. (IN #2838-84)* jboppjr@aol.com True the Vote, Inc. Voters' Rights Initiative THE BOPP LAW FIRM, PC 1 South Sixth St. Terre Haute, IN 47807-3510 Telephone: 812/232-2434

Lead Counsel for Plaintiffs * Pro Hac Vice application granted

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Local Counsel for Plaintiffs

Certificate of Service

I hereby certify that on November 13, 2020, I caused the foregoing Motion to be filed with the United States District Court for the Middle District of Pennsylvania, Williamsburg Division, via the Court's CM/ECF system, which served all counsel of record.

> <u>/s/ Anita Y. Milanovich</u> Anita Y. Milanovich Counsel for Plaintiffs