

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

PENNSYLVANIA STATE
CONFERENCE OF THE NAACP, *et al.*,

Plaintiffs,

v.

AL SCHMIDT, in his official capacity as
Secretary of the Commonwealth, *et al.*,

Defendants

Case No. 1:22-cv-00339-SPB

and

REPUBLICAN NATIONAL
COMMITTEE, *et al.*,

Intervenor-Defendants

PLAINTIFFS' MOTION FOR A RULE 54(B) JUDGMENT

Pursuant to Rule 54(b) of the Federal Rules of Civil Procedure, the Plaintiffs Pennsylvania State Conference of the NAACP, League of Women Voters of Pennsylvania, Philadelphians Organized to Witness, Empower and Rebuild, Common Cause Pennsylvania, Black Political Empowerment Project, Make the Road Pennsylvania, Barry M. Seastead, Marlene G. Gutierrez, Aynne Polinski, Joel Bencan, and Laurence Smith hereby move this Court to direct entry of a final judgment as to Counts I and III of their operative Amended Complaint, so that those claims may be resolved in a single appeal with the companion case in which this Court recently granted summary judgment on the same claims. *See* Mem. Op., *Eakin v. Adams Cnty. Bd. of Elecs.*, No. 22 Civ. 340 (W.D. Pa. Mar. 31, 2025) (“*Eakin*”), ECF No. 438.

The grounds for this Motion are set forth more fully in the accompanying Memorandum of Law, which is incorporated by reference herein.

A proposed order is attached as Exhibit A to this Motion.

Dated: April 14, 2025

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Respectfully submitted,

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Pennsylvania, Black Political
Empowerment Project, Make the Road
Pennsylvania, Barry M. Seastead,
Marlene G. Gutierrez, Aynne Margaret
Pleban Polinski, Joel Bencan, and
Laurence M. Smith*

CERTIFICATE OF SERVICE

I hereby certify that, on the date set forth below, I caused a true and correct copy of the foregoing Motion for a Rule 54(b) Judgment to be served via the Court's electronic filing system upon all counsel of record.

Dated: April 14, 2025
/s/ Ari Savitzky