

**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 Acting
Secretary of the Commonwealth, *et al.*,

Defendants.

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

PLAINTIFFS' MOTION FOR LEAVE TO AMEND

Pursuant to Rule 15 of the Federal Rules of Civil Procedure, 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 Margaret Polinski, Joel Bencan and Laurence Smith hereby move this Court for an order granting them leave to amend their complaint to add an additional cause of action. The grounds for this Motion are set forth more fully in the accompanying Memorandum of Law, which are incorporated by reference herein.

A copy of the proposed Second Amended Complaint showing the changes from the First Amended Complaint (ECF No. 121), a clean copy of the proposed Second Amended Complaint with appendices thereto, and a proposed Order granting the requested relief are appended to this Motion.

Dated: May 17, 2024

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Respectfully submitted,

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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 to Amend to be served via the Court's electronic filing system upon all counsel of record.

Dated: May 17, 2024
/s/ Ari Savitzky