

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Louis Agre, William Ewing, Floyd Montgomery,
Joy Montgomery, and Rayman Solomon,

Plaintiffs,

v.

Thomas W. Wolf, Governor of Pennsylvania,
Pedro Cortes, Secretary of State of
Pennsylvania, and Jonathan Marks,
Commissioner of the Bureau of Elections, in
their official capacities,

Defendants.

Civil Action No. 2:17-cv-4392

**MOTION TO INTERVENE BY MICHAEL C. TURZAI, SPEAKER OF THE
PENNSYLVANIA HOUSE OF REPRESENTATIVES, and JOSEPH B. SCARNATI, III,
PENNSYLVANIA SENATE PRESIDENT PRO TEMPORE**

Proposed Intervenors Michael C. Turzai, in his official capacity as Speaker of the Pennsylvania House of Representatives, and Joseph B. Scarnati, III, in his official capacity as Pennsylvania Senate President Pro Tempore (collectively, the “Applicants”), by and through their undersigned counsel, respectfully request, pursuant to Rule 24 of the Federal Rules of Civil Procedure, to intervene as defendants in the above-captioned proceeding for the purpose of participating in the disposition of the proceeding. In support of this Motion, Applicants submit the accompanying Memorandum of Law. Additionally, Applicants submit the following proposed pleadings in response to the Complaint: (1) Motion to Dismiss Plaintiffs’ Complaint, with Memorandum of Law and attachments, attached as **Exhibit 1**; and (2) Motion to Stay and/or Abstain, with Memorandum of Law and attachments, attached as **Exhibit 2**.

WHEREFORE, Applicants respectfully request that the Court GRANT their Motion to Intervene and permit the Applicants to intervene as Defendants in this proceeding.

Dated: October 24, 2017

Respectfully submitted,

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