

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

PENNSYLVANIA STATE CONFERENCE)	
OF THE NAACP, <i>et al.</i> ,)	
)	Civil Action No.: 1:22-cv-00339
Plaintiffs,)	
)	
v.)	Judge Susan P. Baxter
)	
LEIGH M. CHAPMAN, <i>et al.</i> ,)	
)	
Defendants.)	

INTERVENOR-DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT

Intervenor-Defendants, the Republican National Committee, National Republican Congressional Committee, and Republican Party of Pennsylvania, support and seek to uphold free and fair elections on behalf of all Pennsylvanians. Intervenor-Defendants therefore respectfully move the Court to uphold the General Assembly’s duly enacted laws governing Pennsylvania’s elections and to grant summary judgment against Plaintiffs on Count II. Intervenor-Defendants submit the accompanying Memorandum of Law demonstrating that Count II fails “as a matter of law.” Fed. R. Civ. P. 56(a). The General Assembly’s duly enacted date requirement for absentee and mail-in ballots does not implicate, let alone violate, the Equal Protection Clause of the U.S. Constitution.

WHEREFORE, Intervenor-Defendants respectfully request that the Court GRANT this motion and GRANT summary judgment against Plaintiffs.

Dated: May 29, 2024

Respectfully submitted,

/s/ Kathleen A. Gallagher

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