

**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 SUMMARY JUDGMENT**

Pursuant to Rule 56 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 summary judgment against Defendants.

The grounds for this Motion are set forth more fully in the accompanying Brief and L.R. 56(B)(1) Statement, and the Appendix filed on April 21, 2023 in connection

with Plaintiffs’ prior summary judgment motion (ECF Nos. 277-282 & 288), all of which are incorporated by reference herein.

A proposed order is attached to this Motion.

Dated: May 29, 2024

Respectfully submitted,

/s/ Ari J. Savitzky

Stephen Loney (PA 202535)  
Marian K. Schneider (PA 50337)  
Kate I. Steiker-Ginzberg (PA 332236)  
AMERICAN CIVIL LIBERTIES UNION OF  
PENNSYLVANIA  
P.O. Box 60173  
Philadelphia, PA 19102  
sloney@aclupa.org  
mschneider@aclupa.org  
ksteiker-ginzberg@aclupa.org

Ari J. Savitzky  
Megan C. Keenan  
Sophia Lin Lakin  
Adriel I. Cepeda Derieux  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
125 Broad Street, 18<sup>th</sup> Floor  
New York, NY 10004  
Tel.: (212) 549-2500  
asavitzky@aclu.org  
mkeenana@aclu.org  
slakin@aclu.org  
acepedaderieux@aclu.org

Witold J. Walczak (PA 62976)  
AMERICAN CIVIL LIBERTIES UNION OF  
PENNSYLVANIA  
P.O. Box 23058  
Pittsburgh, PA 15222  
Tel: (412) 681-7736  
vwalczak@aclupa.org

*Counsel for the 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  
Pleban Polinski, Joel Bencan, and  
Laurence M. Smith*

David Newmann (PA 82401)  
Brittany C. Armour (PA 324455)  
HOGAN LOVELLS US LLP  
1735 Market Street, 23<sup>rd</sup> Floor  
Philadelphia, PA 19103  
Tel: (267) 675-4610  
david.newmann@hoganlovells.com  
brittany.armour@hoganlovells.com

**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 Summary Judgment, along with the proposed order attached thereto, to be served via the Court's electronic filing system upon all counsel of record.

Dated: May 29, 2024  
/s/ Ari Savitzky

RETRIEVED FROM DEMOCRACYDOCKET.COM