

IN THIS TOGETHER NEPA, INC.;	:	IN THE COURT OF COMMON PLEAS
JENNY L. WILCZAK; HANNAH	:	OF LUZERNE COUNTY
BUTTERWICK; AND CAROLE	:	
SHEARER,	:	No. 202410567
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
ROMILDA CROCAMO, IN HER	:	
OFFICIAL CAPACITY AS LUZERNE	:	
COUNTY MANAGER; AND LUZERNE	:	
COUNTY BOARD OF ELECTIONS	:	
AND REGISTRATION,	:	
	:	
Defendants.	:	

STIPULATION TO DISMISS AS MOOT PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

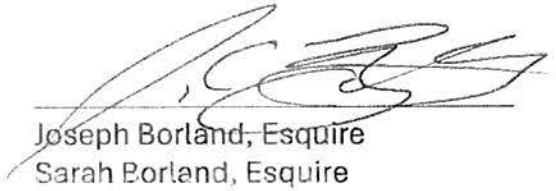
Plaintiffs, In This Together NEPA, Inc., Jenny L. Wilczak, Hannah Butterwick and Carole Shearer, and Defendant, Romilda Crocamo, in her official capacity as Luzerne County Manager, by and through their respective counsel, hereby stipulate and agree to the following:

1. On October 1, 2024, Plaintiff filed their Complaint and Motion for Preliminary Injunction.
2. Plaintiffs' Motion for Preliminary Injunction seeks that Defendant Crocamo only be enjoined from not deploying ballot drop boxes for the 2024 general election in alleged contravention of the Luzerene County Board of Elections and Registration's Resolution R-2022-1 ("Resolution R-2022-1") (a copy of which is attached hereto and incorporated herein by reference).

3. On October 4, 2024, counsel for Defendant Crocamo advised counsel for Plaintiffs that she would agree to imminently deploy ballot drop boxes in accordance with Resolution R-2022-1.
4. Defendant Crocamo expressly denies that she is under any legal obligation to deploy ballot drop boxes,
5. Given the foregoing, and in connection with the November 5, 2024 general election, Defendant Crocamo, in her official capacity as Luzerne County Manager, and without admitting any obligation to do so will deploy ballot drop boxes for voters consistent with Resolution R-2022-1.
6. Defendant Crocamo, in her official capacity as Luzerne County Manager, shall not, cause the removal of any ballot drop boxes deployed pursuant Resolution R-2022-1 before 5:00 PM on November 4, 2024 with the exception of ballot drop box deployed at Penn Place which remain available until 8:00 PM on November 5, 2024.
7. In recognition of the foregoing, Plaintiffs acknowledge and agree that their pending Motion for Preliminary Injunction is hereby withdrawn.
8. Nothing in this agreement shall preclude county, municipal or state law enforcement officials from carrying their duties to protect public safety, even if that means access to a drop box is temporarily curtailed.
9. The parties agree The Court shall retain jurisdiction over the above matter which shall remain pending before the Court until such time as the Court may otherwise determine.

Date: 10/6/24


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Date: 10/6/24

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*Attorneys for Defendant Romilda
Crocamo, in her official capacity as
Luzerne County Manager*

This 7th day of October 2024 the above Stipulation between Plaintiffs and Defendant

Romilda Crocamo is hereby APPROVED BY THE COURT:

_____ J.