

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

)	
League of Women Voters of Pennsylvania,)	
)	
<i>et al.</i> ,)	
)	Civ. No. 261 MD 2017
<i>Petitioners</i> ,)	
)	
v.)	
)	
The Commonwealth of Pennsylvania,)	
)	
<i>et al.</i> ,)	
<i>Respondents</i> .)	

**PETITIONERS’ APPLICATION TO COMPEL PRODUCTION
OF NON-PRIVILEGED DOCUMENTS FROM
RESPONDENTS TURZAI AND SCARNATI**

Petitioners, through their counsel, move to compel Respondents Turzai and Scarnati to produce non-privileged documents responsive to Petitioners’ discovery requests.

1. Respondents acknowledge that they have non-privileged documents in their possession, but they are refusing to produce them (*see* email chain attached as Exhibit A).

2. Respondents previously told this Court that they possess non-privileged documents and that they intended to produce those documents to Petitioners. Specifically, in footnote 12 on page 16 of their Legislative Privilege brief concerning Petitioners’ First Set of Requests for Production, Respondents stated: “In their Motion to Strike, Petitioners point out that the Speech or Debate Clause privilege does not shield a legislator from producing all documents in his/her possession. Legislative Respondents do not dispute this point, and *they intend to produce responsive non-privileged documents that are in their possession*” (citation omitted; emphasis added).

3. In addition, Petitioners served on Respondents a Second Set of Requests for Production on November 14, 2017, requesting “[a]ll documents that [Respondents] contend support any claim by [Respondents] that the 2011 Plan was created without partisan intent,” and “[a]ll documents that [Respondents] intend to rely on at trial.”

4. Respondents have not responded to these November 14 requests. The Court’s privilege order did not address them. And Respondents have never suggested that all documents responsive to Petitioners’ Second Set of Requests for Production are privileged. Nor could they, as documents that Respondents “intend to rely on at trial” are obviously not privileged.

5. Despite all this, Respondents now take the position that they will not produce even *non-privileged* documents -- documents that Respondents themselves concede are not subject to any applicable privilege -- unless Petitioners “agree that in doing so [Respondents are] in no way waiving (in whole or in part) [their] legislative privilege or any other rights to refrain from participating in discovery as recognized in the Court’s Memorandum.” See Exhibit A.

6. Nothing in the Court’s November 22, 2017 Order absolves Respondents of their obligation to produce *non-privileged* documents responsive to Petitioners’ requests. The Pennsylvania Rules require Respondents to produce non-privileged documents, and they do not require Petitioners to “agree” to anything in order to obtain the production of non-privileged documents. That is especially so in light of the extremely prejudicial nature of the “agreement” that Respondents request.

7. Of course Petitioners will not agree that Respondents may *selectively* produce and/or then rely on at trial certain facts, data, or analyses that the legislature or legislators relied on or created in drawing the 2011 Plan. Nor may Respondents selectively produce and/or rely on at trial *some* documents that reflect the legislature’s or legislators’ “intentions, motivations,

and activities” -- which this Court has held are privileged -- and then claim that *other* such documents retain their privilege and need not be produced. But that would be the consequence of the agreement Respondents seek from Petitioners -- that Respondents can unilaterally declare any favorable document non-privileged without risking the privilege of any related document they seek to withhold. That is not the law. This is no different than any other case in which litigants claim that certain documents are privileged under this Court’s rulings, while others are not. They must produce the non-privileged documents, and they are not permitted to condition the production of non-privileged documents on stipulations by the other side.

8. Petitioners accordingly request that the Court compel Respondents Turzai and Scarnati to produce all non-privileged documents responsive to Petitioners’ discovery requests by this Wednesday, November 29th.

Dated: November 27, 2017

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Respectfully submitted,

/s/ Benjamin D. Geffen

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Counsel for Petitioners

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

League of Women Voters of Pennsylvania,)	
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<i>Petitioners,</i>)	Civ. No. 261 MD 2017
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The Commonwealth of Pennsylvania,)	
)	
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)	
<i>Respondents.</i>)	

[PROPOSED] ORDER

AND NOW, this _____ day of _____, 2017, upon consideration of Petitioners' Application to Compel Production of Non-Privileged Documents from Respondents Turzai and Scarnati, it is hereby ORDERED that the Application is GRANTED.

Respondents Turzai and Scarnati are directed to produce all non-privileged documents responsive to Petitioners' discovery requests by this Wednesday, November 29th.

BY THE COURT:

J.

Exhibit A

From: Paszamant, Brian [<mailto:Paszamant@BlankRome.com>]
Sent: Monday, November 27, 2017 11:59 AM
To: zzz.External.mmckenzie@pubintl.org; Kathleen Gallagher; Carolyn McGee; zzz.External.BGeffen@pubintl.org; zzz.External.mchurchill@pubintl.org; maronchick@hangle.com; mhangle@hangle.com; claudia.depalma@gmail.com; alacey@cohenlaw.com; amitinger@cohenlaw.com; clevine@cohenlaw.com; jbloom@stradley.com; kmyers@stradley.com; lbarrett@pa.gov; sconcannon@pa.gov; thowell@pa.gov; LazarP@earthlink.net; lawrence.tabas@obermayer.com; rebecca.warren@obermayer.com; Gersch, David P.; Freedman, John A.; Jones, Stanton; Theodore, Elisabeth; Clark, Helen Mayer; Jacobson, Daniel; Robinson, John; Bergman, Andrew D.; jtorchinsky@hvjt.law; ssheehy@hvjt.law; Snyderman, Jason A.; Wixted, John P.; Silberfarb, Michael D.; tgates@pa.gov; ieverhart@pa.gov; kkotula@pa.gov
Cc: Jason R Mclean; Terri Kuhn; Russell Giancola
Subject: RE: League of Women Voters of Pennsylvania et al. v. Commonwealth of Pennsylvania, No. 261 MD 2017 (Pa. Commw. Ct.) - Discovery Requests Directed to Petitioners

Mimi,

Thank you for the email. Although I am perplexed by Petitioners' refusal of this completely reasonable offer, I suppose that Petitioners have their reasons. PPT Scarnati will not be producing any documents in light of Petitioners' refusal of this offer. Please include this email chain in any related filing that Petitioners make with the Court.

BP

Brian S. Paszamant | Blank Rome LLP

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From: Mimi McKenzie [<mailto:mmckenzie@pubintl.org>]
Sent: Monday, November 27, 2017 11:18 AM
To: Kathleen Gallagher <KGallagher@c-wlaw.com>; Paszamant, Brian <Paszamant@BlankRome.com>; Carolyn McGee <CMcgee@c-wlaw.com>; Ben Geffen <BGeffen@pubintl.org>; Michael Churchill <mchurchill@pubintl.org>; maronchick@hangle.com <maronchick@hangle.com>; mhangle@hangle.com <mhangle@hangle.com>; claudia.depalma@gmail.com <claudia.depalma@gmail.com>; alacey@cohenlaw.com <alacey@cohenlaw.com>; amitinger@cohenlaw.com <amitinger@cohenlaw.com>; clevine@cohenlaw.com <clevine@cohenlaw.com>; jbloom@stradley.com <jbloom@stradley.com>; kmyers@stradley.com <kmyers@stradley.com>; lbarrett@pa.gov <lbarrett@pa.gov>; sconcannon@pa.gov <sconcannon@pa.gov>; thowell@pa.gov <thowell@pa.gov>; LazarP@earthlink.net <LazarP@earthlink.net>; lawrence.tabas@obermayer.com <lawrence.tabas@obermayer.com>; rebecca.warren@obermayer.com <rebecca.warren@obermayer.com>; david.gersch@apks.com <david.gersch@apks.com>; john.freedman@apks.com <john.freedman@apks.com>; stanton.jones@apks.com <stanton.jones@apks.com>; elisabeth.theodore@apks.com <elisabeth.theodore@apks.com>; helen.clark@apks.com <helen.clark@apks.com>;

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Cc: Jason R Mclean <JRMclean@c-wlaw.com>; Terri Kuhn <TKuhn@c-wlaw.com>; Russell Giancola <RGiancola@c-wlaw.com>

Subject: RE: League of Women Voters of Pennsylvania et al. v. Commonwealth of Pennsylvania, No. 261 MD 2017 (Pa. Commw. Ct.) - Discovery Requests Directed to Petitioners

Kathy and Brian

We do not accept your offer. Our position is that you need to produce the non-privileged documents that you concede you have and that you told the Court you would produce. Please advise if you are refusing to produce them. Otherwise, we will expect your production on Wednesday, which is mid-week.

Thank you,
Mimi

Mimi McKenzie

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From: Kathleen Gallagher [<mailto:KGallagher@c-wlaw.com>]

Sent: Saturday, November 25, 2017 12:18 PM

To: Paszamant, Brian <Paszamant@BlankRome.com>; Mimi McKenzie <mmckenzie@pubintl.org>; Carolyn McGee <CMcgee@c-wlaw.com>; Ben Geffen <BGeffen@pubintl.org>; Michael Churchill <mchurchill@pubintl.org>; 'maronchick@hangle.com' <maronchick@hangle.com>; 'mhangle@hangle.com' <mhangle@hangle.com>; 'claudia.depalma@gmail.com' <claudia.depalma@gmail.com>; 'alacey@cohenlaw.com' <alacey@cohenlaw.com>; 'amitinger@cohenlaw.com' <amitinger@cohenlaw.com>; 'clevine@cohenlaw.com' <clevine@cohenlaw.com>; 'jbloom@stradley.com' <jbloom@stradley.com>; 'kmyers@stradley.com' <kmyers@stradley.com>; 'lbarrett@pa.gov' <lbarrett@pa.gov>; 'scon Cannon@pa.gov' <scon Cannon@pa.gov>; 'thowell@pa.gov' <thowell@pa.gov>; 'LazarP@earthlink.net' <LazarP@earthlink.net>; 'lawrence.tabas@obermayer.com' <lawrence.tabas@obermayer.com>; 'rebecca.warren@obermayer.com' <rebecca.warren@obermayer.com>

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<david.gersch@apks.com>; 'john.freedman@apks.com' <john.freedman@apks.com>;
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Cc: Jason R Mclean <JRMclean@c-wlaw.com>; Terri Kuhn <TKuhn@c-wlaw.com>;
Russell Giancola <RGiancola@c-wlaw.com>
Subject: Re: League of Women Voters of Pennsylvania et al. v. Commonwealth of
Pennsylvania, No. 261 MD 2017 (Pa. Commw. Ct.) - Discovery Requests Directed to
Petitioners

Mimi,
Please note that the Speaker joins the position of PPT Scarnati on this issue.
Kindest regards,
Kathy

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Paszamant, Brian" <Paszamant@BlankRome.com>

Date: 11/25/17 9:24 AM (GMT-05:00)

To: Mimi McKenzie <mmckenzie@pubintl.org>, Carolyn McGee
<CMcgee@c-wlaw.com>, Ben Geffen <BGeffen@pubintl.org>, Michael
Churchill <mchurchill@pubintl.org>, "'maronchick@hangley.com'"
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<clevine@cohenlaw.com>, "'jbloom@stradley.com'" <jbloom@stradley.com>,
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'"thowell@pa.gov'" <thowell@pa.gov>, "'LazarP@earthlink.net'"
<LazarP@earthlink.net>, "'lawrence.tabas@obermayer.com'"
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Cc: Kathleen Gallagher <KGallagher@c-wlaw.com>, Jason R Mclean <JRMclean@c-wlaw.com>, Terri Kuhn <TKuhn@c-wlaw.com>, Russell Giancola <RGiancola@c-wlaw.com>

Subject: RE: League of Women Voters of Pennsylvania et al. v. Commonwealth of Pennsylvania, No. 261 MD 2017 (Pa. Commw. Ct.) - Discovery Requests Directed to Petitioners

Mimi,

I believe that the Court's Memorandum is clear on this point as set forth in my email below. That said, in an effort to resolve this issue, I make the following proposal: PPT Scarnati will agree to produce non-privileged documents in his possession by midweek, if Petitioners agree that in doing so PPT Scarnati is in no way waiving (in whole or in part) his legislative privilege or any other rights to refrain from participating in discovery as recognized in the Court's Memorandum. Kindly advise whether Petitioners accept this offer.

BP

Brian S. Paszamant | Blank Rome LLP

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From: Mimi McKenzie [<mailto:mmckenzie@pubintl.org>]

Sent: Saturday, November 25, 2017 6:05 AM

To: Paszamant, Brian <Paszamant@BlankRome.com>; Carolyn McGee <CMcgee@c-wlaw.com>; Ben Geffen <BGeffen@pubintl.org>; Michael Churchill <mchurchill@pubintl.org>; 'maronchick@hangle.com' <maronchick@hangle.com>; 'mhangle.com' <mhangle.com>; 'claudia.depalma@gmail.com' <claudia.depalma@gmail.com>; 'alacey@cohenlaw.com' <alacey@cohenlaw.com>; 'amitinger@cohenlaw.com' <amitinger@cohenlaw.com>; 'clevine@cohenlaw.com' <clevine@cohenlaw.com>; 'jbloom@stradley.com' <jbloom@stradley.com>; 'kmyers@stradley.com' <kmyers@stradley.com>; 'lbarrett@pa.gov' <lbarrett@pa.gov>; 'sconcannon@pa.gov' <sconcannon@pa.gov>; 'thowell@pa.gov' <thowell@pa.gov>; 'LazarP@earthlink.net' <LazarP@earthlink.net>; 'lawrence.tabas@obermayer.com'

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Cc: Kathleen Gallagher <KGallagher@c-wlaw.com>; Jason R Mclean <JRMclean@c-wlaw.com>; Terri Kuhn <TKuhn@c-wlaw.com>; Russell Giancola <RGiancola@c-wlaw.com>

Subject: RE: League of Women Voters of Pennsylvania et al. v. Commonwealth of Pennsylvania, No. 261 MD 2017 (Pa. Commw. Ct.) - Discovery Requests Directed to Petitioners

Brian

In Legislative Respondents' privilege brief on page 16, footnote 12, you state:
"In their Motion to Strike, Petitioners point out that the Speech or Debate Clause privilege does not shield a legislator from producing all documents in his/her possession. Petitioners' Motion to Strike, Sept. 12, 2017, at p. 5. Legislative Respondents do not dispute this point, and *they intend to produce responsive non-privileged documents that are in their possession* [emphasis added]."

To clarify your email response below, you are refusing to produce documents that are responsive to Petitioners' discovery requests and that you have already stated are non-privileged?

Mimi

Mimi McKenzie

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From: Paszamant, Brian [<mailto:Paszamant@BlankRome.com>]

Sent: Friday, November 24, 2017 7:04 PM

To: Mimi McKenzie <mmckenzie@pubintl.org>; Carolyn McGee <CMcgee@c-wlaw.com>; Ben Geffen <BGeffen@pubintl.org>; Michael Churchill

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Subject: RE: League of Women Voters of Pennsylvania et al. v. Commonwealth of Pennsylvania, No. 261 MD 2017 (Pa. Commw. Ct.) - Discovery Requests Directed to Petitioners

Mimi,

PPT Scarnati did not serve discovery prior to issuance of the stay because his potentially case-dispositive preliminary objections were pending. Of course, those preliminary objections were only overruled once the case was assigned to Judge Brobson and the pertinent order issued. PPT Scarnati served his written discovery shortly thereafter.

In terms of PPT Scarnati's responses to Petitioners' interrogatories and document requests (and document production), section (8) of the Court's Memorandum addresses this issue, and concludes that "the Court lacks the authority to compel Legislative Respondents to produce documents or provide information ..." Put differently, Petitioners are not entitled to any responses or responsive documents from PPT Scarnati.

Additionally, with regard to the document requests served on or about November 14, PPT Scarnati will be responding early next week.

BP

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From: Mimi McKenzie [<mailto:mmckenzie@pubintl.org>]

Sent: Friday, November 24, 2017 2:41 PM

To: Carolyn McGee <CMcgee@c-wlaw.com>; Ben Geffen <BGeffen@pubintl.org>; Michael Churchill <mchurchill@pubintl.org>; 'maronchick@hangley.com' <maronchick@hangley.com>; 'mhangley@hangley.com' <mhangley@hangley.com>; 'claudia.depalma@gmail.com' <claudia.depalma@gmail.com>; 'alacey@cohenlaw.com' <alacey@cohenlaw.com>; 'amitinger@cohenlaw.com' <amitinger@cohenlaw.com>; 'clevine@cohenlaw.com' <clevine@cohenlaw.com>; 'jbloom@stradley.com' <jbloom@stradley.com>; 'kmyers@stradley.com' <kmyers@stradley.com>; 'lbarrett@pa.gov' <lbarrett@pa.gov>; 'sconannon@pa.gov' <sconannon@pa.gov>; 'thowell@pa.gov' <thowell@pa.gov>; 'LazarP@earthlink.net' <LazarP@earthlink.net>; 'lawrence.tabas@obermayer.com' <lawrence.tabas@obermayer.com>; 'rebecca.warren@obermayer.com' <rebecca.warren@obermayer.com>; 'david.gersch@apks.com' <david.gersch@apks.com>; 'john.freedman@apks.com' <john.freedman@apks.com>; 'stanton.jones@apks.com' <stanton.jones@apks.com>; 'elisabeth.theodore@apks.com' <elisabeth.theodore@apks.com>; 'helen.clark@apks.com' <helen.clark@apks.com>; 'daniel.jacobson@apks.com' <daniel.jacobson@apks.com>; 'john.robinson@apks.com' <john.robinson@apks.com>; 'andrew.bergman@apks.com' <andrew.bergman@apks.com>; 'jtorchinsky@hvjt.law' <jtorchinsky@hvjt.law>; 'ssheehy@hvjt.law' <ssheehy@hvjt.law>; Paszamant, Brian <Paszamant@BlankRome.com>; Snyderman, Jason A. <Snyderman@BlankRome.com>; Wixted, John P. <JWixted@BlankRome.com>; Silberfarb, Michael D. <MSilberfarb@blankrome.com>; 'tgates@pa.gov' <tgates@pa.gov>; 'ieverhart@pa.gov' <ieverhart@pa.gov>; 'kkotula@pa.gov' <kkotula@pa.gov>
Cc: Kathleen Gallagher <KGallagher@c-wlaw.com>; Jason R Mclean <JRMclean@c-wlaw.com>; Terri Kuhn <TKuhn@c-wlaw.com>; Russell Giancola <RGiancola@c-wlaw.com>

Subject: RE: League of Women Voters of Pennsylvania et al. v. Commonwealth of Pennsylvania, No. 261 MD 2017 (Pa. Commw. Ct.) - Discovery Requests Directed to Petitioners

Carolyn

Petitioners filed their Petition for Review on June 15 and served discovery requests shortly thereafter, but the Legislative Respondents chose not to serve any discovery requests until Friday evening, November 17 when they served 18 deposition notices, 25 Interrogatories, 23 Requests for Admission, and 50 Requests for Production of Documents. While Legislative Respondents have cited the stay as the reason for their delay in serving discovery, we note that the stay was not entered until October 16, over 4 months after this action was filed, and it was lifted on November 9. In any event, since last Friday we have worked diligently to provide dates for all 18 depositions next week and are currently preparing responses to the written requests. We are certainly under no obligation to respond by 2:00 PM today. We are working on responses over this

holiday weekend, however, and will serve responses when they are ready and before depositions begin on Tuesday.

Meanwhile, Legislative Respondents have yet to produce a single document responsive to Petitioners' long-outstanding discovery requests and even though in their Motion to Strike, Legislative Respondents stated that they intend to produce responsive non-privileged documents that are in their possession. Petitioners' Motion to Strike, Sept. 12, 2017, at p. 5. Nor have Legislative Respondents said when they would respond to Petitioners' discovery requests that were served on November 14. Please let us know when we can expect to receive documents responsive to petitioners' discovery requests.

Thank you,
Mimi McKenzie

Mimi McKenzie
Legal Director
The Public Interest Law Center
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From: Carolyn McGee [<mailto:CMcgee@c-wlaw.com>]
Sent: Sunday, November 19, 2017 3:39 PM
To: Ben Geffen <BGeffen@pubintlaw.org>; Mimi McKenzie <mmckenzie@pubintlaw.org>; Michael Churchill <mchurchill@pubintlaw.org>; 'maronchick@hangle.com' <maronchick@hangle.com>; 'mhangle@hangle.com' <mhangle@hangle.com>; 'claudia.depalma@gmail.com' <claudia.depalma@gmail.com>; 'alacey@cohenlaw.com' <alacey@cohenlaw.com>; 'amitinger@cohenlaw.com' <amitinger@cohenlaw.com>; 'clevine@cohenlaw.com' <clevine@cohenlaw.com>; 'jbloom@stradley.com' <jbloom@stradley.com>; 'kmyers@stradley.com' <kmyers@stradley.com>; 'lbarrett@pa.gov' <lbarrett@pa.gov>; 'sconannon@pa.gov' <sconannon@pa.gov>; 'thowell@pa.gov' <thowell@pa.gov>; 'LazarP@earthlink.net' <LazarP@earthlink.net>; 'lawrence.tabas@obermayer.com' <lawrence.tabas@obermayer.com>; 'rebecca.warren@obermayer.com' <rebecca.warren@obermayer.com>; 'david.gersch@apks.com' <david.gersch@apks.com>; 'john.freedman@apks.com' <john.freedman@apks.com>; 'stanton.jones@apks.com' <stanton.jones@apks.com>; 'elisabeth.theodore@apks.com' <elisabeth.theodore@apks.com>; 'helen.clark@apks.com' <helen.clark@apks.com>; 'daniel.jacobson@apks.com' <daniel.jacobson@apks.com>; 'john.robinson@apks.com' <john.robinson@apks.com>; 'andrew.bergman@apks.com' <andrew.bergman@apks.com>; 'jtorchinsky@hvjt.law' <jtorchinsky@hvjt.law>; 'ssheehy@hvjt.law' <ssheehy@hvjt.law>; 'paszamant@blankrome.com' <paszamant@blankrome.com>; 'snyderman@blankrome.com'

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Cc: Kathleen Gallagher <KGallagher@c-wlaw.com>; Jason R Mclean <JRMclean@c-wlaw.com>; Terri Kuhn <TKuhn@c-wlaw.com>; Russell Giancola <RGiancola@c-wlaw.com>

Subject: RE: League of Women Voters of Pennsylvania et al. v. Commonwealth of Pennsylvania, No. 261 MD 2017 (Pa. Commw. Ct.) - Discovery Requests Directed to Petitioners

Dear Counsel:

In follow up to the discovery requests directed to Petitioners served Friday evening on behalf of the Legislative Respondents (via the e-mail below from my colleague Russell Giancola), please kindly serve all of Petitioners' responses to the discovery requests by 2 p.m. on Friday November 24, 2017. Given that the depositions of the Petitioners are scheduled to begin on Tuesday November 28th, it is imperative that we have Petitioners' responses to Legislative Respondents' discovery requests in advance of those depositions in order to ensure we are afforded the opportunity for meaningful depositions.

Thank you.

Regards,
Carolyn McGee

**CAROLYN BATZ MCGEE | ATTORNEY
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From: Russell Giancola

Sent: Friday, November 17, 2017 7:32 PM

To: 'bgeffen@pilcop.org'; 'mmckenzie@pubintlaw.org'; 'mchurchill@pilcop.org'; 'maronchick@hangley.com'; 'mhangley@hangley.com'; 'claudia.depalma@gmail.com'; 'alacey@cohenlaw.com'; 'amitinger@cohenlaw.com'; 'clevine@cohenlaw.com'; 'jbloom@stradley.com'; 'kmyers@stradley.com'; 'lbarrett@pa.gov'; 'sconannon@pa.gov'; 'thowell@pa.gov'; 'LazarP@earthlink.net'; 'lawrence.tabas@obermayer.com'; 'rebecca.warren@obermayer.com'; 'david.gersch@apks.com'; 'john.freedman@apks.com'; 'stanton.jones@apks.com'; 'elisabeth.theodore@apks.com'; 'helen.clark@apks.com'; 'daniel.jacobson@apks.com'; 'john.robinson@apks.com'; 'andrew.bergman@apks.com'; 'jtorchinsky@hvjt.law'; 'ssheehy@hvjt.law'; 'paszaman@blankrome.com'; 'snyderman@blankrome.com'; 'jwixed@blankrome.com'; 'Silberfarb, Michael D.'; 'tgates@pa.gov'; 'ieverhart@pa.gov'; 'kkotula@pa.gov'

Cc: Kathleen Gallagher; Carolyn McGee; Jason R Mclean; 'Jacob McCrea'; Terri Kuhn

Subject: League of Women Voters of Pennsylvania et al. v. Commonwealth of Pennsylvania, No. 261 MD 2017 (Pa. Commw. Ct.) - Discovery Requests Directed to Petitioners

Counsel:

Please find attached the following:

- Respondents Michael C. Turzai and Joseph B. Scarnati III's Requests for Admission Directed to Petitioners;
- Respondents Michael C. Turzai and Joseph B. Scarnati III's Interrogatories Directed to Petitioners; and
- Respondents Michael C. Turzai and Joseph B. Scarnati III's Requests for Production of Documents Directed to Petitioners

RUSSELL D. GIANCOLA | ATTORNEY

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