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**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

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

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**LEGISLATIVE RESPONDENTS' RESPONSE TO PETITIONERS'  
MOTION *IN LIMINE* TO PRECLUDE LEGISLATIVE RESPONDENTS  
FROM OFFERING EVIDENCE OR ARGUMENT ABOUT THEIR  
INTENTIONS, MOTIVATIONS, AND ACTIVITIES IN ENACTING THE  
2011 PLAN**

Based upon this Court's ruling of November 22, 2017, holding that Legislative Respondents maintain an absolute legislative privilege, Legislative Respondents do not intend to present evidence of their intentions or motivations, beyond that which is reflected in the transcripts of the legislative history and debates, which are public records and have been produced in this case.

Legislative Respondents have no intention of presenting any other evidence of their intentions or motivations. Only if Petitioners are permitted to introduce privileged information would Legislative Respondents reconsider this approach.

For the foregoing reasons, Legislative Respondents respectfully request that this Court DENY Petitioners' Motion.

December 10, 2017

Respectfully Submitted

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*/s/ Brian S. Paszamant*

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