

2. Further, Plaintiffs move this Honorable Court for a Temporary Restraining Order, pursuant to Federal Rule of Civil Procedure 65(b), et seq., to enjoin the Defendants and their agents from continued violations of the Pennsylvania Election Code related to the 28,879 (or more) erroneous ballots cast by mail which are being improperly handled by Defendants and to Order that all of the said 28,879 ballots and their “replacements” be properly marked as “challenged” without requiring the posting of funds by the Plaintiffs, and further providing for the proper handling of all mail-in ballots cast in Allegheny County and in particular the said 28,879 ballots identified as “erroneous.”

3. The motion for temporary restraining order is supported by Plaintiffs’ Amended Complaint for Declaratory and Injunctive Relief [ECF 28] filed contemporaneously with this Motion and the Affidavits of Chew and Hagerman attached thereto. [ECF 28-2].

4. Plaintiffs request an expedited hearing.

NOTICE OF HEARING

Plaintiffs will bring present their Amended Motion for a Temporary Restraining Order before the Hon. J. Nicholas Ranjan at a time and place to be determined by the Court.

Respectfully Submitted,

**DILLON, MCCANDLESS, KING,
COULTER & GRAHAM, LLP**

***Special Counsel for the Amistad Project of
the Thomas More Society***

Dated: October 22, 2020

By: /s/ Thomas W. King, III
Thomas W. King, III
Thomas E. Breth
Jordan P. Shuber

Counsel for Plaintiffs