

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

JILL STEIN, RANDALL REITZ, ROBIN HOWE,
SHANNON KNIGHT, EMILY COOK, and
KIMBERLY KUPKA,

Plaintiffs,

-against-

PEDRO A. CORTÉS, in his official capacity as
Secretary of the Commonwealth; and JONATHAN
MARKS, in his official capacity as Commissioner
of the Bureau of Commissions, Elections, and
Legislation,

Defendants.

No. 16-CV-6287 (PD)

CROSS-MOTION FOR SUMMARY JUDGMENT

In the event that the Court converts Defendants' motion to dismiss the Amended Complaint, Dkt. #74, into a motion for summary judgment pursuant to Federal Rule of Civil Procedure 12(d), Plaintiffs Jill Stein, Randall Reitz, Robin Howe, Shannon Knight, Emily Cook, and Kimberly Kupka cross-move for summary judgment as to liability on all causes of action in the Amended Complaint pursuant to Federal Rule of Civil Procedure 56, upon the Amended Complaint, all exhibits annexed thereto and incorporated by reference therein, and the enclosed memorandum of law.

Wherefore, this Court should grant the relief as set forth in the proposed order.

Dated: March 29, 2017

MONTGOMERY McCracken Walker &
Rhoads LLP

Gregory M. Harvey
123 South Broad Street
Philadelphia, PA 19109
Phone: 215-772-7684
Fax: 215-772-7620
Email: gharvey@mmwr.com

EMERY Celli Brinckerhoff & Abady
LLP

_____/s/_____
Ilann M. Maazel*
Andrew G. Celli, Jr.*
Alison E. Frick*
Douglas E. Lieb*
600 Fifth Avenue, 10th Floor
New York, NY 10020
Phone: 212-763-5000
Fax: 212-763-5001
Email: imaazel@ecbalaw.com

* *Admitted pro hac vice*