

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

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*Counsel for Plaintiffs, Sean Parnell and
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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

SEAN PARNELL, et al.,	:	CIVIL ACTION
	:	
Plaintiffs,	:	CASE NO. 2:20-cv-1570
vs.	:	
	:	
ALLEGHENY COUNTY BOARD OF ELECTIONS, et al.,	:	
	:	
Defendants.	:	

PROPOSED ORDER

AND NOW, this ___ day of October 2020, upon consideration of the parties' proposed Order, it is hereby ORDER as follows:

1. Defendants shall immediately secure in sealed and locked containers all absentee ballots and mail-in ballots received by Defendants, whether through the United States Postal Service or at any Office or Satellite Office of the Board of Elections, and shall refrain from accessing, sorting, scanning or removing said ballots from their secured containers until Election Day as provided for in the Election Code.
2. Defendants shall provide the Court and Plaintiffs with an accounting of the 28,879 incorrect ballots issue to electors. The accounting shall include the name, address and voting district of each elector who received an incorrect ballot; whether the incorrect ballot was returned by the elector; whether Defendants have secured the incorrect ballot of the elector and how the incorrect ballot has been secured by the Defendants; whether corrected ballots have been provided to each elector and if so, the name, address and voting district of each elector who received a corrected ballot; whether the corrected ballot was returned by the elector; and,

whether Defendants have secured the corrected ballot of the elector and how the corrected ballot has been secured by the Defendants.

3. Defendants are hereby enjoined from denying certificates to eligible poll watchers, watchers, attorneys and/or other representatives as provided under the Pennsylvania Election Code and from denying those individuals access to the Offices, Satellite Offices and/or Polls within Allegheny County.
4. Defendants shall provide Plaintiffs and Plaintiffs' legal counsel with the opportunity to inspect the physical facilities utilized by Defendants to secure and safely keep the absentee and mail-in ballots until Election Day. Said review shall occur no later than October 28, 2020.
5. Further, Defendants shall cause an Allegheny County Sheriff's Deputy to guard the room where the ballots are being stored and provide video footage daily to the Plaintiffs for their review.

Judge J. Nicholas Ranjan