

**IN THE COURT OF COMMON PLEAS OF LEHIGH COUNTY, PENNSYLVANIA
CIVIL DIVISION – LAW**

SEAN GILL, ET. AL.,	:	
	:	
Plaintiffs	:	No. 2022-C-1849
	:	
v.	:	
	:	Assigned Judge:
LEHIGH COUNTY BOARD OF	:	Hon. Thomas A. Capehart
ELECTIONS, ET. AL	:	
	:	
Defendants	:	

STIPULATION

AND NOW, COME the parties to the action, and undersigned counsel, for the purposes of the above-entitled action only, do hereby stipulate and agree as follows:

1. Defendants shall not receive ballots at drop box locations until the October 7, 2022 hearing on the Motion for a Preliminary Injunction and further Order of the Court.
2. Defendants may receive mailed and absentee ballots in person at the Lehigh County Board of Elections, Lehigh County Government Center, 17 South Seventh Street, Allentown, PA 18101 between the hours of 8:00 a.m. and 4:00 p.m. prior to the October 7, 2022 hearing on the Motion for a Preliminary Injunction and further order of the Court.
3. Defendants, and anyone acting through, with, or on behalf of them, shall not accept, count, or canvass any mailed or absentee ballot that Defendants, or anyone acting through, with, or on behalf of them, reasonably know was delivered by a person other than the voter himself or herself, unless such ballot was delivered by an authorized designated agent of a disabled voter.


J.

RESPECTFULLY SUBMITTED,

ON BEHALF OF DEFENDANTS:

/s/ Sarah M. Murray, Esq.

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ON BEHALF OF PLAINTIFFS:

/s/ Walter S. Zimolong III, Esq.

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Smith, Tim Ramos, and Jackie Rivera

Dated: September 9, 2022