

**IN THE COMMONWEALTH COURT
OF PENNSYLVANIA**

Viviette Applewhite, et al.,)	
)	
Petitioners,)	
)	
v.)	
)	
The Commonwealth of Pennsylvania, et al.,)	Docket No. 330 MD 12
Respondents.)	

STIPULATION

Petitioners and Respondents, by and through their undersigned counsel, hereby stipulate as follows:

1. There have been no investigations or prosecutions of in-person voter fraud in Pennsylvania; and the parties do not have direct personal knowledge of any such investigations or prosecutions in other states;
2. The parties are not aware of any incidents of in-person voter fraud in Pennsylvania and do not have direct personal knowledge of in person voter fraud elsewhere;
3. Respondents will not offer any evidence in this action that in-person voter fraud has in fact occurred in Pennsylvania or elsewhere;
4. The sole rationale for the Photo ID law that will be introduced by Respondents is that contained in Respondents' Amended answer to Interrogatory 1, served June 7, 2012.
5. Respondents will not offer any evidence or argument that in person voter fraud is likely to occur in November 2012 in the absence of the Photo ID law.
6. Neither the Governor nor the Attorney General will testify at the hearing on this matter.

<p>By: <i>Patrick S. Cawley</i></p> <hr/> <p>Patrick S. Cawley, Esq. Senior Deputy Attorney General Civil Litigation Section 15th Floor, Strawberry Square Harrisburg, PA 17120</p> <p>Attorney for Respondents</p>	<p>By: <i>Jennifer R. Clarke</i></p> <hr/> <p>Jennifer R. Clarke Public Interest Law Center of Philadelphia 1709 Benjamin Franklin Parkway, 2nd Floor Philadelphia PA 19103</p> <p>Attorney for Petitioners</p>
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Date: July 12, 2012

Applewhite, et al. v.
Commonwealth of PA, et al.
330 M.D. 2012 - Petitioners

