

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**WILLIAM PENN SCHOOL
DISTRICT, et al.**

Petitioners,

v.

**PENNSYLVANIA DEPARTMENT OF
EDUCATION, et al,**

Respondents.

No. 587 MD 2014

**ANSWER TO LEGISLATIVE RESPONDENTS' PRELIMINARY
OBJECTIONS TO PETITION**

Petitioners, through their counsel and pursuant to Rules 1516(b) and 1517 of the Pennsylvania Rules of Appellate Procedure and Rules 1028 and 1029 of the Pennsylvania Rules of Civil Procedure, hereby submit the following responses to the averments in the Legislative Respondents' Preliminary Objections to Petition.

GENERAL RESPONSES

1. Some or all of the matters asserted in the Preliminary Objections are not preliminary objections recognized in the Pennsylvania Rules of Civil Procedure.
2. Some or all of the matters asserted in the Preliminary Objections raise factual issues which are not the appropriate subject of a demurrer.

RESPONSES TO SPECIFIC AVERMENTS

1. Denied. Petitioners aver that paragraph 1 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 1 inaccurately characterize the Petition, which speaks for itself, and they are, therefore, deemed denied.

Petitioners refer to their Petition for a full and accurate description of its contents.

2. Denied. Petitioners aver that paragraph 2 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 2 purport to summarize the holdings of *Danson v. Casey*, 399 A.2d 360 (Pa. 1979) and *Marrero ex rel. Tabalas v. Commonwealth*, 739 A.2d 110 (Pa. 1999), which speak for themselves, and they are, therefore, deemed denied. Petitioners refer to these cases for a full and accurate description of their contents.

3. Denied. Petitioners aver that paragraph 3 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 3 purport to summarize the holding of *Danson v. Casey*, 399 A.2d 360 (Pa. 1979), which speaks for itself, and they are, therefore, deemed denied. Petitioners refer to this case for a full and accurate description of its contents.

4. Denied. Petitioners aver that paragraph 4 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 4 purport to summarize the holding of *Danson v. Casey*, 399 A.2d 360 (Pa. 1979), which speaks for itself, and they are, therefore, deemed denied. Petitioners refer to this case for a full and accurate description of its contents.

5. Denied. Petitioners aver that paragraph 5 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 5 purport to summarize the holding of *Marrero ex rel. Tabalas v. Commonwealth*, 739 A.2d 110 (Pa. 1999), which speaks for itself, and they are, therefore, deemed denied. Petitioners refer to this case for a full and accurate description of its contents.

6. Denied. Petitioners aver that paragraph 6 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 6 purport to summarize the holding of *Marrero ex rel. Tabalas v. Commonwealth*, 739 A.2d 110 (Pa. 1999), which speaks for itself, and they are, therefore, deemed denied. Petitioners refer to this case for a full and accurate description of its contents.

7. Denied. Petitioners aver that paragraph 7 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a

response is required, the averments in paragraph 7 inaccurately characterize the Petition, which speaks for itself, and they are, therefore, deemed denied.

Petitioners refer to their Petition for a full and accurate description of its contents.

8. Denied. Petitioners aver that paragraph 8 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 8 purport to quote from *Commonwealth v. Hartman*, 17 Pa. 118, 119 (1851), which speaks for itself.

Petitioners refer to this case for a full and accurate description of its contents.

9. Denied. Petitioners aver that paragraph 9 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 9 purport to quote from *Commonwealth v. Hartman*, 17 Pa. 118, 119 (1851), which speaks for itself.

Petitioners refer to this case for a full and accurate description of its contents.

10. Denied in part, admitted in part. Petitioners admit that the allegations of the Petition must be taken as true for the purposes of the preliminary objections. Except as so admitted, the averments in paragraph 10 do not require a response and they are, therefore, deemed denied.

11. Denied. Petitioners aver that paragraph 11 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

12. Denied. Petitioners aver that paragraph 12 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

13. Denied. Petitioners aver that paragraph 13 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

14. Denied. Petitioners aver that paragraph 14 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

15. Denied. Petitioners aver that paragraph 15 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 15 purport to summarize the holding of *Marrero ex rel. Tabalas v. Commonwealth*, 739 A.2d 110 (Pa. 1999), which speaks for itself, and they are, therefore, deemed denied. Petitioners refer to this case for a full and accurate description of its contents.

16. Denied. Petitioners aver that paragraph 16 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

17. Denied. Petitioners aver that paragraph 17 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

18. Denied. Petitioners aver that paragraph 18 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

19. Denied. Petitioners aver that paragraph 19 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

20. Denied. Petitioners aver that paragraph 20 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

21. Denied. Petitioners aver that paragraph 21 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

22. Denied. Petitioners aver that paragraph 22 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

23. Denied. Petitioners aver that paragraph 23 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

24. Denied. Petitioners aver that paragraph 24 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

25. Denied. Petitioners aver that paragraph 25 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

26. Denied. Petitioners aver that paragraph 26 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

27. Denied. Petitioners aver that paragraph 27 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

28. Denied. Petitioners aver that paragraph 28 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

29. Denied. Petitioners aver that paragraph 29 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

30. Denied. Petitioners aver that paragraph 30 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

31. Denied. Petitioners aver that paragraph 31 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

32. Denied. Petitioners aver that paragraph 32 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

33. Denied. Petitioners aver that paragraph 33 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

34. Denied. Petitioners aver that paragraph 34 contains legal conclusions to which no response is required and is, therefore, deemed denied.

35. Denied. Petitioners aver that paragraph 35 contains legal conclusions to which no response is required and is, therefore, deemed denied.

36. Denied. Petitioners aver that paragraph 36 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 36 purport to quote *Marrero ex rel. Tabalas v. Commonwealth*, 739 A.2d 110 (Pa. 1999), which speaks for itself. Petitioners refer to this case for a full and accurate description of its contents.

37. Denied. Petitioners aver that paragraph 37 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 37 purport to quote *Marrero ex rel. Tabalas v. Commonwealth*, 739 A.2d 110 (Pa. 1999), which speaks for itself. Petitioners refer to this case for a full and accurate description of its contents.

38. Denied. Petitioners aver that paragraph 38 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 38 inaccurately characterize the Petition, which speaks for itself, and they are, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

39. Denied. Petitioners aver that paragraph 39 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

40. Denied. Petitioners aver that paragraph 40 contains legal conclusions to which no response is required and is, therefore, deemed denied.

41. Denied. Petitioners aver that paragraph 41 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 41 purport to quote *School District of Philadelphia v. Twer*, 447 A.2d 222, 225 (Pa. 1982), which speaks for itself. Petitioners refer to this case for a full and accurate description of its contents.

42. Denied. Petitioners aver that paragraph 42 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 42 purport to quote *Danson v. Casey*, 399 A.2d 360 (Pa. 1979), which speaks for itself. Petitioners refer to this case for a full and accurate description of its contents.

43. Denied. Petitioners aver that paragraph 43 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 43 inaccurately characterize the Petition, which speaks for itself, and they are, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

44. Denied in part, admitted in part. Petitioners aver that paragraph 44 contains legal conclusions to which no response is required and is, therefore, deemed denied.

45. Petitioners only admit that Governor Corbett signed Act 51 of 2014 and that the Basic Education Funding Commission has commenced its work. Petitioners aver that Act 51 of 2014 speaks for itself. Except as so admitted and so averred, the averments in paragraph 45 are deemed denied; Petitioners deny that Act 51 of 2014 demonstrates that the General Assembly has made an effort “to determine the appropriate method for funding education in Pennsylvania.”

46. Denied. Petitioners aver that paragraph 46 contains legal conclusions to which no response is required and is, therefore, deemed denied.

47. Denied. Petitioners aver that paragraph 47 contains legal conclusions to which no response is required and is, therefore, deemed denied.

48. Denied. Petitioners aver that paragraph 48 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 48 purport to quote from the Petition, which speaks for itself. Petitioners refer to their Petition for a full and accurate description of its contents.

49. Denied. Petitioners aver that paragraph 49 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 49 inaccurately characterize the Petition, which speaks for itself, and they are, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

50. Denied. Petitioners aver that paragraph 50 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 50 purport to quote *Danson v. Casey*, 399 A.2d 360 (Pa. 1979), which speaks for itself. Petitioners refer to this case for a full and accurate description of its contents.

51. Denied. Petitioners aver that paragraph 51 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 51 purport to quote *Marrero ex rel. Tabalas v. Commonwealth*, 739 A.2d 110 (Pa. 1999), which speaks for itself. Petitioners refer to this case for a full and accurate description of its contents.

52. Denied. Petitioners aver that paragraph 52 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 52 purport to quote *Chartiers Valley Joint Schools v. County Bd. of School Directors of Allegheny County*, 211 A.2d 487, 500 (Pa. 1965), which speaks for itself. Petitioners refer to this case for a full and accurate description of its contents.

53. Denied. Petitioners aver that paragraph 53 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 53 purport to quote *Danson v.*

Casey, 399 A.2d 360 (Pa. 1979), which speaks for itself. Petitioners refer to this case for a full and accurate description of its contents.

54. Denied. Petitioners aver that paragraph 54 contains legal conclusions to which no response is required and is, therefore, deemed denied.

55. Denied. Petitioners aver that paragraph 55 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

56. Denied. Petitioners aver that paragraph 56 contains legal conclusions to which no response is required and is, therefore, deemed denied.

57. Denied. Petitioners aver that paragraph 57 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 57 inaccurately characterize the Petition, which speaks for itself, and they are, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

58. Denied. Petitioners aver that paragraph 58 contains legal conclusions to which no response is required and is, therefore, deemed denied.

59. Denied. Petitioners aver that paragraph 59 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 59 purport to quote *Marrero ex*

rel. Tabalas v. Commonwealth, 739 A.2d 110 (Pa. 1999), which speaks for itself.

Petitioners refer to this case for a full and accurate description of its contents.

60. Denied. Petitioners aver that paragraph 60 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 60 inaccurately characterize the Petition, which speaks for itself, and they are, therefore, deemed denied.

Petitioners refer to their Petition for a full and accurate description of its contents.

61. Denied. Petitioners aver that paragraph 61 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

62. Denied. Petitioners aver that paragraph 62 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 62 inaccurately characterize the Petition, which speaks for itself, and they are, therefore, deemed denied.

Petitioners refer to their Petition for a full and accurate description of its contents.

63. Denied. Petitioners aver that paragraph 63 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 63 inaccurately characterize the Petition, which speaks for itself, and they are, therefore, deemed denied.

Petitioners refer to their Petition for a full and accurate description of its contents.

WHEREFORE, Petitioners respectfully request this Court overrule Legislative Respondents' First Preliminary Objection.

64. Denied. Petitioners aver that paragraph 64 inaccurately characterizes the Petition, which speaks for itself and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

65. Denied. Petitioners aver that paragraph 65 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 65 purport to quote *Harrisburg Sch. Dist. v. Zogby*, 828 A.2d 1079, 1087 (Pa. 2003), which speaks for itself. Petitioners refer to this case for a full and accurate description of its contents.

66. Denied. Petitioners aver that paragraph 66 contains legal conclusions to which no response is required and is, therefore, deemed denied.

67. Denied. Petitioners aver that paragraph 67 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 67 purport to summarize the holding of *Marrero ex rel. Tabalas v. Commonwealth*, 739 A.2d 110 (Pa. 1999), which speaks for itself, and they are, therefore, deemed denied. Petitioners refer to this case for a full and accurate description of its contents

68. Denied. Petitioners aver that paragraph 68 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a

response is required, the averments in paragraph 68 purport to summarize the holding of *Danson v. Casey*, 399 A.2d 360 (Pa. 1979), which speaks for itself, they are, therefore, deemed denied. Petitioners refer to this case for a full and accurate description of its contents.

69. Denied. Petitioners aver that paragraph 69 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 69 inaccurately characterize the Petition, which speaks for itself, and they are, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

70. Denied. Petitioners aver that paragraph 70 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

71. Denied. Petitioners aver that paragraph 71 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 71 inaccurately characterize the Petition, which speaks for itself, and they are, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

72. Denied. Petitioners aver that paragraph 72 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

73. Denied. Petitioners aver that paragraph 73 contains legal conclusions to which no response is required and is, therefore, deemed denied.

74. Denied. Petitioners aver that paragraph 74 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 74 inaccurately characterize the Petition, which speaks for itself, and they are, therefore, deemed denied.

Petitioners refer to their Petition for a full and accurate description of its contents.

75. Denied. Petitioners aver that paragraph 75 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 75 inaccurately characterize the Petition, which speaks for itself, and they are, therefore, deemed denied.

Petitioners refer to their Petition for a full and accurate description of its contents.

WHEREFORE, Petitioners respectfully request this Court overrule Legislative Respondents' Second Preliminary Objection.

76. Denied. Petitioners aver that paragraph 76 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

77. Denied. Petitioners aver that paragraph 77 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 77 purport to quote *Pennsylvania*

Liquor Control Bd. v. Spa Athletic Club, 485 A.2d 732, 734 (Pa. 1984), which speaks for itself. Petitioners refer to this case for a full and accurate description of its contents.

78. Denied. Petitioners aver that paragraph 78 contains legal conclusions to which no response is required and is, therefore, deemed denied.

79. Denied. Petitioners aver that paragraph 79 contains legal conclusions to which no response is required and is, therefore, deemed denied.

80. Denied. Petitioners aver that paragraph 80 inaccurately characterizes the Petition, which speaks for itself, and is, therefore, deemed denied. Petitioners refer to their Petition for a full and accurate description of its contents.

81. Denied. Petitioners aver that paragraph 81 contains legal conclusions to which no response is required and is, therefore, deemed denied. To the extent a response is required, the averments in paragraph 81 purport to summarize the holding of *Danson v. Casey*, 399 A.2d 360 (Pa. 1979), which speaks for itself, and they are, therefore, deemed denied. Petitioners refer to this case for a full and accurate description of its contents.

82. Denied. Petitioners aver that paragraph 82 contains legal conclusions to which no response is required and is, therefore, deemed denied.

WHEREFORE, Petitioners respectfully request this Court overrule Legislative Respondents' Third Preliminary Objection.

Dated: December 19, 2014

Respectfully Submitted,

By: /s/ Jennifer R. Clarke

By: /s/ Maura McInerney

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Attorneys for Plaintiffs Jamella and Bryant Miller, Sheila Armstrong, Tyesha Strickland, Angel Martinez, Barbara Nemeth, Tracey Hughes, Pennsylvania Association of Rural and Small Schools, and the National Association for the Advancement of Colored People—Pennsylvania State Conference.

By: /s/ Matthew J. Sheehan

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Association of Rural and Small
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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

WILLIAM PENN SCHOOL DISTRICT,
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Petitioners,

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PENNSYLVANIA DEPARTMENT OF
EDUCATION et al.,

Respondents.

No. 587 M.D. 2014

**[PROPOSED] ORDER
REGARDING LEGISLATIVE
RESPONDENTS'
PRELIMINARY
OBJECTIONS TO PETITION**

ORDER

AND NOW, this ____ day of _____, 20__, upon consideration of the Preliminary Objections submitted by Legislative Respondents in the above-captioned matter and Petitioners' Answers thereto, it is hereby **ORDERED** that the Legislative Respondents' Preliminary Objections are **OVERRULED**.

BY THE COURT:

J.

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

:
:
:

PROOF OF SERVICE

I hereby certify that I am this 19th day of December 2014 serving the foregoing document upon the persons and in the manner indicated below, which service satisfies the requirements of Pa. R.A.P. 121:

Service

Served: Robert M. Tomaine, Jr.
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Office of General Counsel
Service Method: Certified Mail
Service Date: 12/19/2014
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Phone: 717-783-6563
Representing: Respondent Pennsylvania Department of Education

Served: Sen. Joseph B. Scarnati III
Senate President Pro Tempore
Service Method: Certified Mail
Service Date: 12/19/2014
Address: Senate Box 203025
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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

PROOF OF SERVICE

(Continued)

Served: Rep. Samuel H. Smith
Speaker of the House
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Service Date: 12/19/2014
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Served: Governor Thomas W. Corbett
Service Method: Certified Mail
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Served: Carolyn Dumaresq
Secretary of Education
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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

PROOF OF SERVICE

(Continued)

Served: Kathleen Kane
Office of the Attorney General
Service Method: Certified Mail
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By: /s/ Matthew J. Sheehan
(Signature of the Person Serving)

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Petitioner The School District of Lancaster
Petitioner Greater Johnstown School District
Petitioner Wilkes-Barre Area School District
Petitioner Shenandoah Valley School District
Petitioner Pennsylvania Association of Rural and
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By: /s/ Jennifer R. Clarke
(Signature of the Person Serving)

Person Serving: Jennifer R. Clarke
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Representing:

Petitioner William Penn School District
Petitioner Panther Valley School District
Petitioner The School District of Lancaster
Petitioner Greater Johnstown School District
Petitioner Wilkes-Barre Area School District
Petitioner Shenandoah Valley School District
Petitioner Jamella and Bryant Miller
Petitioner Sheila Armstrong
Petitioner Tyesha Strickland
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Petitioner Barbara Nemeth
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Petitioner National Association for the
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Pennsylvania State Conference.