

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>WILLIAM FRENCH AND</b>	:	
<b>MELYNDA ANN REESE,</b>	:	<b>CIVIL ACTION--LAW</b>
	:	
<b>Plaintiffs,</b>	:	
<b>v.</b>	:	<b>Case No.: 3:23-cv-538</b>
	:	
<b>LUZERNE COUNTY AND</b>	:	
<b>LUZERNE COUNTY BOARD</b>	:	<b>(JUDGE MANNION)</b>
<b>OF ELECTIONS AND</b>	:	
<b>REGISTRATION,</b>	:	
	:	
<b>Defendants.</b>	:	

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56, Defendants Luzerne County (“County”) and the Luzerne County Board of Elections and Registration (the “Board”) (collectively, “Defendants”), by and through their undersigned counsel, respectfully request that this Court enter summary judgment in their favor on all counts in the complaint of Plaintiffs William French and Melynda Anne Reese (collectively “Plaintiffs”) because there is no genuine dispute of material fact and Defendants are entitled to judgment as a matter of law. In support of this motion, Defendants rely upon and incorporates herein by reference its statement of undisputed material facts as to which no genuine issue remains to be tried and supporting brief, which will be filed in accordance with the Local Rules of Civil Procedure in the Middle District of Pennsylvania.

**WHEREFORE**, Defendants Luzerne County and the Luzerne County Board of Elections and Registration respectfully requests this Court grant their motion for summary judgment in its entirety.

Respectfully submitted,

*Drew P. McLaughlin*

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Drew P. McLaughlin

Keighlyn J. Oliver

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DATED: April 15, 2024

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	:	
<b>Defendants.</b>	:	

**CERTIFICATE OF SERVICE**

I, Drew P. McLaughlin, hereby certify that I have caused to be served this day a true and correct copy of the foregoing Defendants' Motion for Summary Judgment via electronic filing as follows:

Walter S. Zimolong, III, Esq.  
James Fitzpatrick, Esq.  
Zimolong, LLC  
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*Attorneys for Plaintiffs*

/s/ Drew P. McLaughlin  
Drew P. McLaughlin

DATED: April 15, 2024