

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

JILL STEIN, RANDALL REITZ, ROBIN HOWE,
SHANNON KNIGHT, and EMILY COOK,

Plaintiffs,

-against-

KATHY BOOCKVAR, in her official capacity as
Acting Secretary of the Commonwealth; and
JONATHAN MARKS, in his official capacity as
Commissioner of the Bureau of Commissions,
Elections, and Legislation,

Defendants.

No. 16-CV-6287 (PD)

**DECLARATION OF ILANN M. MAAZEL IN SUPPORT OF
PLAINTIFFS' MOTION TO ENFORCE SETTLEMENT AGREEMENT**

ILANN M. MAAZEL declares, under penalty of perjury, pursuant to 28 U.S.C.

§ 1746, that the following is true and correct:

1. I am a partner in the firm of Emery Celli Brinckerhoff & Abady LLP, counsel for Plaintiffs in this matter. I am admitted *pro hac vice* in this action. I submit this declaration in support of Plaintiffs' motion to enforce the settlement agreement.

2. Attached as Exhibit A is a copy of the settlement agreement in this case.

3. Attached as Exhibit B is a copy of Pennsylvania's Report Concerning the Reexamination of Election Systems and Software ExpressVote XL, issued by Kathy Boockvar on September 3, 2019, downloaded at my direction from [https://www.dos.pa.gov/VotingElections/Documents/Voting%20Systems/ESS%20EVS%206021/Reexamination%20Results%20\(ExpressVote%20XL\)%2009-03-2019.pdf](https://www.dos.pa.gov/VotingElections/Documents/Voting%20Systems/ESS%20EVS%206021/Reexamination%20Results%20(ExpressVote%20XL)%2009-03-2019.pdf).

4. Attached as Exhibit C is a copy of Plaintiffs' first letter to Defendants regarding noncompliance with the Settlement Agreement, dated July 29, 2019.

5. Attached as Exhibit D is a copy of Defendants' response to Plaintiffs' first letter concerning noncompliance with the Settlement Agreement, dated September 12, 2019.

6. Attached as Exhibit E is a copy of Plaintiffs' second letter to Defendants concerning noncompliance with the Settlement Agreement, dated October 1, 2019.

7. Attached as Exhibit F is Defendants' response to Plaintiffs' second letter concerning noncompliance with the Settlement Agreement, dated October 30, 2019.

8. Attached as Exhibit G is a copy of a statement by Amy Hess, Acting Registrar of the Northampton County Election Office, dated November 6, 2019, downloaded at my direction from <https://www.northamptoncounty.org/CTYEXEC/Documents/110519%20PR%20Election%20Results.pdf>.

9. Attached as Exhibit H is a copy of an article by Emily Opilo and Tom Shortell titled "Northampton County to rescan ballots after GOP chair calls for recount: 'We have a hanging chad moment'" from *The Morning Call* dated November 6, 2019, downloaded at my direction from <https://www.mcall.com/news/elections/mc-nws-election-voting-machine-results-confusion-20191106-b7syviya35efxassqhntfdyai4-story.html>.

10. Attached as Exhibit I is a copy of an article by Kartikay Mehrotra and Margaret Newkirk titled "Expensive Glitchy Voting Machines Expose 2020 Hacking Risks: Paper ballots may be safer and cheaper, but local officials swoon at digital equipment" from *Bloomberg* dated November 8, 2019, downloaded at my direction from <https://www.bloomberg.com/news/articles/2019-11-08/expensive-glitchy-voting-machines-expose-2020-hacking-risks>.

