

**IN THE SUPREME COURT OF PENNSYLVANIA
MIDDLE DISTRICT**

DENNIS J. BAYLOR,	:	No. 9 MM 2012
Petitioner	:	
	:	
	:	PETITION FOR REVIEW OF 2011
	:	FINAL REAPPORTIONMENT PLAN
	:	
2011 LEGISLATIVE REAPPORTIONMENT:	:	
COMMISSION,	:	
Respondent	:	PRELIMINARY OBJECTIONS TO
	:	PRELIMINARY OBJECTIONS

PRELIMINARY OBJECTIONS TO PRELIMINARY OBJECTIONS

Petitioner Dennis Baylor, files Preliminary Objections to the Preliminary Objections filed by the Respondent 2011 Legislative Reapportionment Commission on the grounds that they fail to conform to the Rules of Appellate Procedure and in support of that claim, would respectfully show:

1. Petitioner, Dennis Baylor, is presently before this Honorable Court seeking review of the 2011 Final Reapportionment Plan, in this Honorable Court's Original Jurisdiction. ..
2. Under Rule 106 of the rules of Appellate Procedure "Unless otherwise prescribed by these rules the practice and procedure in matters brought before an appellate court within its original jurisdiction shall be in accordance with the appropriate general rules applicable to practice and procedure in the courts of common pleas, so far as they may be applied."
3. On January 12, 2012 ,at or about 3:30 pm I was served with two

unique sets of Preliminary Objections, (three if you include amendment of one set), one alleging petitioner failed to submit a pleading in numbered paragraph form, the second alleged a verification was required but omitted from my filing.

Pursuant to Rule 1028(b) of Pennsylvania's Rules of Civil Procedure "All preliminary objections shall be raised at one time. They shall state specifically the grounds relied upon and may be inconsistent. Two or more preliminary objections may be raised in one pleading."

WHEREFORE, all premises considered, Petitioner requests Respondent's Preliminary Objections be dismissed.

Respectfully Submitted

BY:

Dennis Baylor
2654 Mountain Road
Hamburg, Pa. 19526
(610) 781-8746
dennisbaylor@gmail.com
Petitioner pro se

VERIFICATION

I, DENNIS BAYLOR, hereby affirm under the penalty of 18 P.S. §4904 related to the unsworn falsification to authorities that the factual statements contained in the foregoing Application are, to the best of my recollection and belief, true and accurate.

CERTIFICATE OF SERVICE

I, Dennis Baylor, petitioner pro se, hereby certify that on this date a true and correct copy of the attached **PRELIMINARY OBJECTIONS TO** **PRELIMINARY OBJECTIONS** was served on the following parties via

electronic mail;

coconnor@redistricting.state.pa.us
ccraykane@redistricting.state.pa.us
jdelsole@dscslaw.com
wstickman@dscslaw.com

and by U.S. Mail, First-class, postage paid delivery to the office of:

Honorable Joseph a Del Sole
The Waterfront Building
200 First Avenue, Suite 300
Pittsburgh, PA 15222

Dennis Baylor, Petitioner *pro se*
2654 Mountain Road
Hamburg, Pa. 19526
(610) 781-8746

DATE: January 13, 2012

dennisbaylor@gmail.com