

the truth of this allegation. Unnumbered Paragraph 3 of the Application also states, “It is in clear violation of your duties as Director of Board of Election.” This allegation calls for a legal conclusion to which no response is required. To the extent a further response is deemed required, Common Cause denies the allegation.

7.

FOURTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred because she lacks the requisite clear legal right to relief in order for a writ of mandamus to issue.

FIFTH AFFIRMATIVE DEFENSE

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*motion for admission *pro hac vice*
forthcoming

