

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

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IVY HILL CONGREGATION OF  
JEHOVAH’S WITNESSES,

Petitioner,

No. 316 MD 2020

v.

COMMONWEALTH OF PENNSYLVANIA,  
DEPARTMENT OF HUMAN SERVICES,

Respondent.

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**PETITIONER’S REPLY TO NEW MATTER**

Petitioner Ivy Hill Congregation of Jehovah’s Witnesses, by and through its undersigned counsel, hereby submits this Reply to New Matter, and in support thereof, avers as follows:

88. Denied. The allegations contained in this paragraph constitute conclusions of law to which no response is required; as such, they are denied. By way of further response, the Commonwealth Court has already expressly concluded this legal defense is without merit, *see* Memorandum Opinion (Pa. Cmwlth. June 17, 2021).

89. Denied. The allegations contained in this paragraph constitute conclusions of law to which no response is required; as such,

they are denied. By way of further response, Exhibit A, being in writing, speaks for itself, and all characterizations thereof are denied.

90. Denied. The allegations contained in this paragraph constitute conclusions of law to which no response is required; as such, they are denied. By way of further response, the Commonwealth Court has already expressly concluded this legal defense is without merit, *see* Memorandum Opinion (Pa. Cmwlth. June 17, 2021).

91. Denied. The allegations contained in this paragraph constitute conclusions of law to which no response is required; as such, they are denied. By way of further response, the Commonwealth Court has already expressly concluded this legal defense is without merit, *see* Memorandum Opinion (Pa. Cmwlth. June 17, 2021).

92. Denied. The allegations contained in this paragraph constitute conclusions of law to which no response is required; as such, they are denied. By way of further response, the Commonwealth Court has already expressly concluded this legal defense is without merit, *see* Memorandum Opinion (Pa. Cmwlth. June 17, 2021).

93. Denied. The allegations contained in this paragraph constitute conclusions of law to which no response is required; as such, they are denied.

WHEREFORE, Petitioner Ivy Hill Congregation respectfully requests that the Court enter judgment in Petitioner's favor.

Respectfully submitted,

Dated: July 27, 2021

/s/ Joshua J. Voss  
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