



IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA :
 :
 v. : NO. CR-2421-2011
 : NO. CR-2422-2011
 GERALD A. SANDUSKY :

COMMONWEALTH'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
FILE RESPONSE TO AMENDED PETITION FOR POST-CONVICTION
RELIEF

TO THE HONORABLE JOHN M. CLELAND, SENIOR JUDGE:

NOW COMES, the Commonwealth of Pennsylvania, by and through its attorneys, who files this unopposed motion for extension of time to file a response to amended petition for post-conviction relief, and, in support thereof, avers as follows:

1. The defendant, Gerald A. Sandusky, ("Sandusky"), filed an amended petition for relief pursuant to the Pennsylvania Post-Conviction Relief Act ("PCRA"), 42 Pa.C.S. § 9541, *et seq.*, on May 6, 2015, wherein he submitted 15 claims for this Court's consideration.
2. By order of this Court, the Commonwealth was directed to file a response to the petition on or before June 5, 2015.
3. Your undersigned counsel entered her appearance on April 20, 2015 following the sudden and unexpected departure of her supervisor who had been working on Sandusky's cases for several years.
4. Your undersigned counsel has been diligently working to familiarize herself with Sandusky's cases and to respond to the allegations contained

in the amended PCRA petition, but is in need of an extension of time in order to submit a thorough and well-reasoned response to this Court.

5. The reasons for this request are as follows. Due to the fact that a permanent supervisor has not yet been hired, the Appeals and Legal Services Section continues to operate with its attorneys shouldering a heavy caseload. With the many new cases, including two additional capital cases, your undersigned has deadlines and court appearances that require her time/attention. For example, during the past month, your undersigned filed briefs in the Pennsylvania Superior Court, prepared documents in connection with the Commonwealth's interlocutory appeals in a capital case and forfeiture case, submitted proposed findings of fact and conclusions of law following a PCRA hearing, and assisted the Attorney General with her duties as member of the Pennsylvania Board of Pardons in preparation for a merit review session of 100 applications. Additionally, she was recently assigned to handle litigation in the appeals of Timothy Curley, Gary Schultz and Graham Spanier presently pending in the Superior Court; she has been preparing for an evidentiary hearing in a capital case in York County on July 27, 2015 and is in the process of selecting/retaining experts to review the reports/opinions of the 5 defense experts; and, she has been preparing for a pre-trial motion hearing in a first-degree murder case scheduled for June 17, 2015.
6. In light of the aforementioned circumstances, especially your undersigned's relatively recent assignment to Sandusky's case, she is in

serious need of additional time in which to submit her response to the amended PCRA petition.

7. This request is made in good faith and is not intended to predicate undue delay in this case.
8. Counsel for Sandusky, Alexander H. Lindsay, Esquire and the Lindsay Law Firm, P.C., have no objection to this request for an extension of time.

WHEREFORE, based on the aforementioned reasons, the Commonwealth respectfully requests this Court to issue an order granting this unopposed motion and to enlarge the time period in which to file the response to the amended PCRA petition.


Respectfully submitted,

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Date: June 1, 2015

IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY
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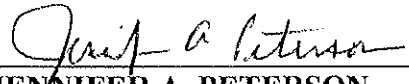
COMMONWEALTH OF PENNSYLVANIA	:	
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v.	:	NO. CR-2421-2011
	:	NO. CR-2422-2011
GERALD A. SANDUSKY	:	

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving one copy of the foregoing document upon the person and in the manner indicated below.

Service by first-class mail addressed as follows:

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Dated: June 1, 2015