

IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA)

vs.)

GERALD A. SANDUSKY)

Nos. CP-14-CR-2421-2011 &
CP-14-CR-2422-2011

Commonwealth Attorneys:

Frank Fina, Esquire
Joseph McGettigan, Esquire
Jonelle H. Eshbach, Esquire
Joseph L. Amendola, Esquire
Karl E. Rominger, Esquire
Norris E. Gelman, Esquire

Defense Attorney:

**DEFENDANT'S RESPONSE TO EXPEDITED MOTION TO INTERVENE AND
FOR ACCESS TO EVIDENCE ADMITTED AT TRIAL**

TO THE HONORABLE JOHN M. CLELAND, SENIOR JUDGE, SPECIALLY ASSIGNED
TO THESE MATTERS IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY,
PENNSYLVANIA:

AND NOW, comes the Defendant, GERALD A. SANDUSKY, through his
attorney, Joseph L. Amendola, Esquire, who respectfully files an Answer on behalf of the
Defendant to the Expedited Motion to Intervene filed by American Broadcasting
Companies, Inc. (ABC) and hereby advises the Court the Defendant does not object to
the relief requested by ABC's Expedited Motion to Intervene based upon the averments
made therein.

As further answer to the Expedited Motion to Intervene filed by ABC, the
Defendant respectfully represents:

1. Defendant's counsel requests, however, that the Court exercise its
judicial discretion in taking measures to maintain the integrity and security of the exhibits
to which ABC has requested access for purposes of inspection and photocopying.

2. Defendant's counsel does not believe the dissemination of any of the aforementioned exhibits will affect any future proceedings in this case, although he cannot speak for the Commonwealth in regard to whether such dissemination may affect any ongoing Commonwealth investigations related to other cases.

3. Defendant's counsel believes the Court will exercise appropriate judicial discretion in insuring that appropriate security measures are put in place during any such inspection and photocopying requested by ABC and, consequently, does not anticipate a need for the Defendant to have a representative present during any such third party access to the aforementioned exhibits.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joseph L. Amendola", is written over a horizontal line.

Joseph L. Amendola, Esquire
Attorney for Defendant
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Date: November 6, 2012

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