

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:

Joseph McGettigan, Esquire

Jonelle H. Eshbach, Esquire

Defense Attorney:

Joseph L. Amendola, Esquire

**DEFENDANT'S ANSWER TO COMMONWEALTH'S MOTION FOR
PRE-TRIAL DISCOVERY REGARDING EXPERT WITNESSES**

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 answers the Commonwealth's
aforementioned Motion:

1. Admitted.

2. The Defendant, through counsel, has stated on a number of
occasions including in his motions for a continuance that his experts are awaiting the
receipt of discovery materials to evaluate them, form appropriate expert opinions and
reduce those expert opinions to writing in the form of a report. To date, the Defendant is
still awaiting additional materials which his experts have indicated are critical to their
evaluation and preparation of a report in the Defendant's cases. By way of further
answer, Defendant's experts have also expressed their strong opinions it will be critically
important for them to evaluate the testimony of those Accusers/Alleged Victims who

testified before the Grand Jury in this matter in order for them to fully and completely evaluate the Defendant's cases and to properly prepare the reports in this matter. In fact, one (1) of the Defendant's supplemental motions filed on May 16, 2012 deals with this very issue.

3. The Defendant has stated on a number of occasions he has engaged the services of expert witnesses in his cases.

4. As soon as Defendant's expert witnesses receive the necessary materials from the Commonwealth and third parties in order to properly review, evaluate, and prepare reports in the Defendant's cases, the Defendant will provide the Commonwealth with copies of those reports. The Defendant will provide the Commonwealth with copies of all such reports which he intends to introduce as evidence at his trial as soon as he receives those reports from his experts.

5. Please see Defendant's answers to Paragraph Nos. 2 and 4.

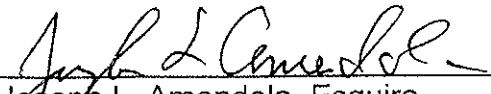
6. Please see Defendant's answers to Paragraph Nos. 2 and 4.

7. Please see Defendant's answers to Paragraph Nos. 2 and 4.

8. Please see Defendant's answers to Paragraph Nos. 2 and 4.

WHEREFORE, the Defendant submits he will provide the Commonwealth with the requested information and reports as soon as he receives these materials from his experts.

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
110 Regent Court, Suite 202
State College, PA 16801
(814) 234-6821
I.D. No. 17667

Date: May 16, 2012

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CERTIFICATE OF SERVICE

AND NOW, this 16th day of May, 2012, I, Joseph L. Amendola, hereby
certify that I have, this date, served a copy of the foregoing document, by:

Hand Delivery

Hon. John M. Cleland, Senior Judge
c/o Ms. Maxine Ishler, Court Administrator
Centre County Courthouse
102 South Allegheny Street
Bellefonte, Pennsylvania 16823

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BY:



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